

Exhibit 1

Exhibit 1

Exhibit 1

IN THE SUPERIOR COURT OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

RONNIE D. JORDAN, an)	
individual,)	CASE NO. CIVSB2201281
)	
Plaintiff,)	
)	
vs.)	
)	
THE ORIGINAL MOWBRAY'S TREE)	
SERVICE, INCORPORATED,)	
et al.,)	
)	
Defendants.)	
_____)	

REMOTE VIDEOTAPED DEPOSITION OF

ROBIN MOWBRAY

May 30, 2023

9:02 a.m.

Kieu Pham, CSR NO. 13667

<p>Page 2</p> <p>1 APPEARANCES OF COUNSEL</p> <p>2</p> <p>3 On Behalf of the Plaintiff:</p> <p>4 CATANZARITE LAW CORPORATION</p> <p>5 Kenneth J. Catanzarite, Esq.</p> <p>6 2331 West Lincoln Avenue</p> <p>7 Anaheim, California 92801</p> <p>8 (714) 520-5544</p> <p>9 Kcatanzarite@catanzarite.com</p> <p>10</p> <p>11 On Behalf of the Defendants:</p> <p>12 CKB VIENNA, LLP</p> <p>13 Stephen Cho, Esq.</p> <p>14 9531 Pittsburgh Avenue</p> <p>15 Rancho Cucamonga, CA 91730</p> <p>16 (909) 980-1040</p> <p>17 Scho@ckbvienna.com</p> <p>18</p> <p>19 Also Present:</p> <p>20 Elizabeth Prado, Videographer</p> <p>21 Ronnie Jordan</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 4</p> <p>1 DEPOSITION OF ROBIN MOWBRAY</p> <p>2 May 30, 2023</p> <p>3</p> <p>4</p> <p>5 THE VIDEOGRAPHER: We are now on the video</p> <p>6 record. This is the video deposition of Robin</p> <p>7 Mowbray taken by the plaintiff in the matter of</p> <p>8 Ronnie D. Jordan versus The Original Mowbray's Tree</p> <p>9 Service, Incorporated, et al. filed in the Superior</p> <p>10 Court of California for the County of San</p> <p>11 Bernardino, case number CIVSB2201281 held via web</p> <p>12 videoconference on May 30, 2023, at 9:02 a.m.</p> <p>13 Pacific time.</p> <p>14 I am Elizabeth Prado, the videographer. The</p> <p>15 court reporter is Kieu Pham. We are from the firm</p> <p>16 AdvancedONE.</p> <p>17 Would counsel on the conference please</p> <p>18 identify yourselves and state whom you represent</p> <p>19 beginning with the questioning attorney.</p> <p>20 MR. CATANZARITE: Good morning, all. Ken</p> <p>21 Catanzarite appearing for Ronnie Jordan, plaintiff.</p> <p>22 MR. CHO: Good morning. Stephen Cho for</p> <p>23 Robin Mowbray and the Mowbray defendant.</p> <p>24 THE VIDEOGRAPHER: Thank you. The court</p> <p>25 reporter will now swear in the witness.</p>
<p>Page 3</p> <p>1 INDEX OF EXAMINATION</p> <p>2</p> <p>3 WITNESS: ROBIN MOWBRAY</p> <p>4</p> <p>5 EXAMINATION</p> <p>6</p> <p>7 BY MR. CATANZARITE</p> <p>8</p> <p>9</p> <p>10</p> <p>11 INDEX TO EXHIBITS</p> <p>12</p> <p>13 PLAINTIFF'S</p> <p>14</p> <p>15 2 Monthly Payment Summary 62</p> <p>16</p> <p>17 4 5/28/18 Letter re: Employment 42</p> <p>18 Contract Between Ronnie Jordan and</p> <p>19 The Original Mowbray's Tree Service,</p> <p>20 Inc., Bates Plaintiff Jordan's PODs 48</p> <p>21 6 Memo to All Mowbray's Employees, 86</p> <p>22 Bates Plaintiff Jordan's PODs 45-47</p> <p>23</p> <p>24 7 4/24/20 E-mail re: Mowbrays - Ronnie 78</p> <p>25 Jordan Employment Agreement, Bates</p> <p>TOMTS 3241-3243</p> <p>8 9/7/22 Pino Statement of Information 96</p> <p>9 Corporation</p> <p>10 4/20/23 Pino Statement of Information 96</p> <p>11 Corporation</p> <p>12</p> <p>13 H Balance Sheet as of December 31, 2018, 67</p> <p>14 Bates TOMTS 3224-3240</p> <p>15 I Employment Agreement 76</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 5</p> <p>1 THE REPORTER: If you raise your right hand,</p> <p>2 please. You do solemnly swear that the testimony</p> <p>3 you are about to give in this deposition proceeding</p> <p>4 will be the truth, the whole truth, and nothing but</p> <p>5 the truth.</p> <p>6 THE WITNESS: I do.</p> <p>7</p> <p>8 EXAMINATION</p> <p>9 BY MR. CATANZARITE:</p> <p>10 Q Good morning, Ms. Mowbray. How are you?</p> <p>11 A I'm good. How are you?</p> <p>12 Q I'm great. Thank you for asking. Have you</p> <p>13 ever had your deposition taken before?</p> <p>14 A Yes.</p> <p>15 Q On how many occasions?</p> <p>16 A Oh, three.</p> <p>17 Q When was the last one?</p> <p>18 A I'd say it probably was a few months ago.</p> <p>19 Q Okay. And in that deposition, you were a</p> <p>20 party or a -- simply a witness?</p> <p>21 A A party. I was a party.</p> <p>22 Q All right. So I'm going to go over the</p> <p>23 admonitions about your testimony here today, and</p> <p>24 I'll be brief since you recently gave your</p> <p>25 deposition.</p>

Page 6

1 Do you understand the oath is -- you took is
2 the same as you'll take at the time of trial?
3 A Yes.
4 Q You understand I'm entitled to your best
5 estimate today without guessing or speculating. Do
6 you understand that?
7 A Yes.
8 Q Do you understand the difference between a
9 guess and speculation and testimony that gives me
10 your best estimate of testimony?
11 A Yes.
12 Q Okay. For purposes of your deposition here
13 today, have you reviewed any documents?
14 A A few, yes.
15 Q Okay. Do you recall what documents you
16 reviewed?
17 A I think it was just a declaration, some text
18 messages, yeah.
19 Q When you say declaration, what declaration
20 do you recall referring to?
21 A I don't recall exactly what it is. Just
22 our -- I forgot what it's called. That we filed our
23 response to the lawsuit.
24 Q Okay. Fair enough. Did you review the
25 sworn statement of your brother, Rick Mowbray?

Page 7

1 A Yes.
2 Q Okay. Did you review that in anticipation
3 of your testimony here today?
4 A Yes.
5 Q Other than discussions with your counsel,
6 did you discuss his sworn statement with anyone
7 else?
8 A No.
9 Q Okay. You understand that when the
10 deposition concludes, you'll be given a copy of the
11 transcript and entitled to make corrections to it.
12 A Yes.
13 Q Okay. You understand, however, that should
14 you change your response substantively, that I may
15 comment upon it adversely at the time of trial.
16 A Yes.
17 Q In other words, I may take the position that
18 you're not telling the truth at the time of trial
19 and you were telling the truth in your deposition or
20 vice versa.
21 Do you understand?
22 A Yes.
23 Q Okay. Is there any reason you can't give me
24 your best testimony today?
25 A No.

Page 8

1 Q Okay. I'd like to first understand what
2 your education is since high school. When did you
3 graduate from high school?
4 A In 1992.
5 Q And did you have any further education
6 beyond high school?
7 A I went to nursing school but did not
8 complete it.
9 Q Okay. And what years did you go to nursing
10 school?
11 A It had to be probably around 1993.
12 Q Okay.
13 A Or '92.
14 Q Did you pursue any other formal education
15 following your efforts at nursing school?
16 A No.
17 Q Okay. Have you taken any courses or
18 training courses on accounting?
19 A No.
20 Q How about finance?
21 A No.
22 Q Have you had any training in the tree
23 service industry?
24 A No.
25 Q Do you hold any licenses as a contractor?

Page 9

1 A No.
2 Q Do you know whether or not Mowbray's -- and
3 we'll call The Original Mowbray's Tree Service, if
4 it's okay with you all, refer to that as MTS. Is
5 that okay?
6 A Sure. Yes.
7 Q And there's also another company called
8 Mowbray Waterman Property, LLC. If I refer to that
9 as MWP, is that okay with you?
10 A Yes.
11 Q Okay. Very good. So -- so do you
12 understand that MTS has licenses?
13 A Yes.
14 Q Okay. Do you know who the responsible
15 managing officer is for those licensed activities?
16 A Ricky Mowbray.
17 Q Okay. How long -- and forgive me. Who is
18 Ricky Mowbray?
19 A He's the current CEO of MTS, and he's also
20 my nephew.
21 Q Okay. And when did Ricky Mowbray become the
22 responsible managing officer of Mowbray -- of MTS?
23 A For the contractor's license, I don't recall
24 the exact date, but a few years, I'm sure.
25 Q Okay. Do you know who the -- if I use the

<p style="text-align: right;">Page 10</p> <p>1 word -- the abbreviation RMO for reasonable managing 2 officer, will you understand that's what I'm 3 referring to? 4 A Yes. 5 Q Okay. Who was the RMO of MTS before Ricky 6 Mowbray? 7 A It was Rhonda Ramirez. 8 Q Is Roger [sic] Ramirez still employed by 9 MTS? 10 A I'm sorry. The name was Rhonda Ramirez. 11 Q Okay. Is she related to you? 12 A Yes. She's my sister. 13 Q Okay. So she was the RMO before Ricky; 14 correct? 15 A Yes, uh-huh. 16 Q And is she employed by MTS today? 17 A Yes. 18 Q Okay. Is her husband, Mr. Ramirez, employed 19 by MTS today? 20 A Yes. 21 Q All right. And Ricky's employed by MTS 22 today; correct? 23 A Yes. 24 Q Okay. So prior to Rhonda becoming RMO, who 25 was RMO before Rhonda?</p>	<p style="text-align: right;">Page 12</p> <p>1 A Just Gloria Mowbray, my mom. 2 Q Okay. And when did Gloria pass? 3 A April 1st, 2021. 4 Q Okay. And did Gloria -- may I refer to her 5 as Gloria? 6 A Yes. 7 Q May I refer to Richard Mowbray as Rick? 8 A Yes. 9 Q And may I refer to Rhonda Ramirez as Rhonda? 10 A Yes. 11 Q Thank you. Did Gloria Mowbray transfer any 12 of her stock before her death? 13 A Yes. She -- no. Actually, no. Not her 14 stock, no. 15 Q Not her stock? 16 A No. 17 Q So -- and I'm referring to the common stock 18 of -- of MTS. 19 A Yes. 20 Q Your testimony is she did not transfer any 21 shares to anyone before she died on April 1st, 2021; 22 is that correct? 23 A Correct. 24 Q Have you ever reported to anybody that you 25 were a shareholder of MTS prior to your mother's</p>
<p style="text-align: right;">Page 11</p> <p>1 A Nobody. She was the original one. 2 Q Okay. And what is your date of birth? 3 A January 6, 1974. 4 Q And if I understand my research team, you're 5 the youngest of the Mowbray children of Gloria 6 Mowbray? 7 A Yes. 8 Q And who -- who -- give me, if you can, the 9 names of the children of Gloria and their 10 approximate ages today. 11 A Richard Mowbray -- Rick Mowbray, he's -- 12 God, he's -- sorry. He's ten years older than me. 13 He's 59. 14 Q Okay. 15 A And then it's Rhonda Ramirez. She's 56. 16 I'm sorry. I'm bad about their exact ages. And 17 then my brother, Randall Mowbray, he's about 52, 53. 18 And then it's me, and I'm 49. 19 Q Thank you for that. Okay. Now, with 20 respect to Mowbray's Tree Service, I note that the 21 company was incorporated years earlier. Do you 22 recall the year Mowbray's or MTS was incorporated? 23 A I believe it was in 2002. 24 Q Okay. And who were the shareholders of 25 Mowbray's at the time it was incorporated?</p>	<p style="text-align: right;">Page 13</p> <p>1 passing? 2 A No. 3 Q Okay. And when she passed, how did her 4 shares transfer? 5 A 100 percent to me. 6 Q To you individually or you in trust? Any 7 type of restrictions on your transfer? 8 A I believe it is a trust. Yeah, it's in her 9 trust. 10 Q Okay. So in other words, your belief is 11 that at Gloria Mowbray's death, her interest in MTS 12 passed into a trust over which you are the trustee? 13 A Yes. 14 Q Did she have something called a revocable 15 trust? 16 A I'm not sure. 17 Q Okay. Were the shares held in trust by you 18 as trustee at the time of her passing? 19 A After -- yes, after passing, yes. 20 Q Okay. And -- and are you the sole trustee 21 of the Gloria Mowbray trust? 22 A Yes. 23 Q Okay. And who are the beneficiaries of the 24 Gloria Mowbray trust? 25 A I believe just me.</p>

Page 14

1 Q Okay. The corporation Mowbray -- MTS, is it
2 a subchapter S corporation?
3 A Yes.
4 Q Do you understand what that means?
5 A Yes.
6 Q What does it mean?
7 A The single 100 percent owner of the
8 corporation.
9 Q 100 percent what?
10 A Sole owner of a corporation.
11 Q Okay.
12 A Single -- yeah.
13 Q So you're the sole owner of the corporation
14 at this point, and Gloria was the sole owner before;
15 correct?
16 A Yes.
17 Q And do I understand that Gloria was the
18 owner so that she -- she received some benefit as a
19 minority -- women's minority enterprise owner?
20 A I think there was more than just that reason
21 why she was the owner. Her and my dad started this
22 company, so --
23 Q I understand your father was -- was injured
24 in a very serious accident and has not been active
25 for years; is that correct?

Page 15

1 A Yes.
2 Q When -- when did the accident occur?
3 A In 1993.
4 Q And I understand he did not recover from
5 that accident. He's disabled today?
6 A Yes.
7 Q Okay. So prior to her death on April 1st,
8 2021, what officer status, if any, did Gloria
9 Mowbray have in MTS?
10 A The owner, I believe. The president.
11 Q Okay. Was she a director of the company?
12 A Yes.
13 Q How many other directors were there, if any?
14 A I don't remember at that time. There
15 might -- I recall maybe three.
16 Q Okay. When you say at that time, you mean
17 at the time of her death?
18 A No. Before. Before.
19 Q All right. So the company's incorporated in
20 2002. Your mother is the sole shareholder of the
21 common stock of the company.
22 And you understand from that point on, that
23 is from 2002, she was the president of the company;
24 is that correct?
25 A I think -- yeah, but that was changed when

Page 16

1 Ronnie was hired. I think he was made the president
2 CEO, and she was just the owner.
3 Q Okay. Fair enough. So there's at least one
4 change you've told me about when Ronnie Jordan was
5 hired. Ronnie became the president and, I believe,
6 chief executive officer; is that correct?
7 A Yes.
8 Q Okay. Now, when Ronnie is hired, do you
9 recall when that is?
10 A Oh, so sorry. I don't know the exact date.
11 I think it was around 2018.
12 Q Around 2018?
13 A Yes.
14 Q Okay. Do you know why he was hired?
15 A I think that he -- well, he was known in
16 this industry, and so my brother, Rick, was -- was
17 talking to about hiring him with my mother and just
18 that -- you know, he was very well-known in the
19 industry, so decided to hire him.
20 Q Okay. So I'd like to go back. Tell me when
21 this hiring is occurring, what is your knowledge of
22 the hiring? And by hiring, I mean of Ronnie Jordan
23 who we'll refer to as Ronnie.
24 A Just that my -- like I said, my brother,
25 Rick, worked with him and knew him prior. I believe

Page 17

1 my mom knew of him, too. And so -- yeah, so they
2 decided to hire him to be the CEO and help us.
3 Q All right. So your brother, Rick, knew of
4 him. Are you familiar with something called the
5 bark beetle project?
6 A Yes.
7 Q And MTS -- were you aware of Ronnie Jordan
8 at the time of the bark beetle project?
9 A I think I heard about him after that.
10 Q Okay. Did MTS work for the company that
11 Ronnie Jordan was then at for the bark beetle
12 project?
13 A You know, I'm not sure. I know Rick's
14 company did, but I don't know if we -- yeah, I
15 believe we did. I believe we did.
16 Q Okay. So -- and you said Rick's company.
17 What company was Rick's company?
18 A His company was Mowbray's Tree Company.
19 Q Okay. And how long did that company
20 operate?
21 A I believe until he went to prison. I think
22 it was around 2008, 2007. I'm sorry. I don't
23 recall the exact time.
24 Q That's okay. Do you recall when he got out
25 of prison?

Page 18

1 A I believe it was around 2011.
2 Q Okay. Did you visit him in prison?
3 A No.
4 Q Was he married at the time he was
5 incarcerated?
6 A Yes.
7 Q Who was he married to?
8 A Denise Mowbray.
9 Q Okay. Was Denise also working at Mowbray's
10 Tree Company?
11 A Yes.
12 Q Did she -- was she also incarcerated?
13 A Yes.
14 Q Did they both go in about the same time,
15 2007 or 8?
16 A I believe she went in after him, but I don't
17 know -- I -- I think maybe it was, like, months
18 after he went.
19 Q Okay. And through -- do you know when
20 Denise got out of prison?
21 A She was there, I think, three and a half,
22 so -- oh, gosh. I want to say -- gosh, I'm so
23 sorry. I'd say maybe around 2010.
24 Q Okay. After Rick got out of prison, did he
25 go to work for Mowbray's?

Page 19

1 A No right away, no.
2 Q Okay. Do you know when he first went to
3 work for Mowbray's? Sorry. Bad question. Do you
4 know when Rick first went to work for Mowbray's
5 after he got out of prison?
6 A Oh, gosh. So he was in there for five
7 years. Let me see. 2000 -- I would say maybe 2013.
8 Q Okay. And was he continuously employed at
9 Mowbray's Tree Service from 2013 until discharge
10 sometime in January 2020?
11 A I believe so, yes.
12 Q Okay. What was his position and function --
13 that is Rick's position and function starting in
14 2013?
15 A I believe he was the operation manager.
16 That was his title.
17 Q What did that entail, if you know?
18 A I think he would just organize maybe, like,
19 work.
20 Q And --
21 A I want to say that. Yeah, I -- yeah, he --
22 yeah, I don't know. He was more involved with the
23 guys in the field, I'd say.
24 Q All right. Is it fair to say that most of
25 what Mowbray's did to generate its money would

Page 20

1 involve, as you termed it, guys in the field?
2 A It probably was more aspects to that.
3 Contracts -- getting contracts. You know, I think
4 it entailed maybe part of it, yes.
5 Q Yeah. In other words, what I mean to say is
6 the guys in the field are cutting down and trimming
7 trees which generates revenue that the company
8 receives; correct?
9 A Yes.
10 Q The people who are in the main office of the
11 company, their administrative function is to support
12 the guys in the field. That is to schedule, pay
13 them, get insurance, enter contracts, and bill and
14 receive money and administer the operations of the
15 company; correct?
16 A Yes.
17 Q Okay. So -- so Rick is out in the field.
18 Is he in -- is he the guy who's -- who's operations
19 manager during that entire time period, 2013 to
20 2020?
21 A I'd say we'd have other people, too. We'd
22 have, you know, Ignacio Huerta was one, Marcos
23 Rodriguez. So I'd say there was other ones, also.
24 Excuse me.
25 Q Uh-huh. Okay. Who reported to Rick, then?

Page 21

1 A I guess you could say Ignacio, maybe. I
2 don't -- I don't really I don't know if he would
3 report to him. I guess they were kind of even
4 because they're all kind of, like, area managers.
5 So I guess I would say the guys in the field.
6 Q Well, you -- you began by saying that
7 Ignacio reported to Rick. Isn't it fair to say that
8 the guys in the field, including those who are also
9 operating groups of people in the field, reported to
10 Rick?
11 A Yes. Yeah.
12 Q Okay. Now, you say that you believed that
13 Rick spoke with Gloria about the availability of
14 Ronnie; is that correct?
15 A Yes.
16 Q I understand you're a very close family and
17 that you take care of your mother and father -- or
18 took care of your father with your mother; is that
19 correct?
20 A Yes.
21 Q Okay. And that you lived close to one
22 another, is that correct, physically?
23 A Yes.
24 Q All right. So the family gets together.
25 Did Rick get together with Gloria in your presence

<p style="text-align: right;">Page 22</p> <p>1 and discuss the availability of hiring Ronnie?</p> <p>2 A I believe -- yes.</p> <p>3 Q Okay. What did he say about why he wanted</p> <p>4 to hire Ronnie?</p> <p>5 A Just that he's very knowledgeable, he knows</p> <p>6 a lot, and he's been around this industry for a</p> <p>7 while and that -- yeah.</p> <p>8 Q Tell me your role at the company at the time</p> <p>9 these conversations are ongoing. Do you have any</p> <p>10 responsibility for general ledger input, for</p> <p>11 example?</p> <p>12 A Um, yeah, I'm sure I had some.</p> <p>13 Q When you say you had some, what general</p> <p>14 ledger accounts did you have responsibility for?</p> <p>15 A You mean, like, my duties? I think one of</p> <p>16 the major ones were, like, payroll. I was a</p> <p>17 corporate secretary.</p> <p>18 Q Were you a director of the company?</p> <p>19 A No.</p> <p>20 Q So you were a corporate secretary, a formal</p> <p>21 title; correct?</p> <p>22 A Yes.</p> <p>23 Q And your mom was president, a formal title;</p> <p>24 correct?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 24</p> <p>1 to the check through a payroll service?</p> <p>2 A On payroll, yes.</p> <p>3 Q Okay. So on payroll, your mother's</p> <p>4 signature would be affixed through the -- some</p> <p>5 application in the software system; is that correct?</p> <p>6 A I believe so, yes.</p> <p>7 Q But she would manually sign various other</p> <p>8 checks?</p> <p>9 A Yes.</p> <p>10 Q Who else had signature authority over the</p> <p>11 bank accounts in May of 2018?</p> <p>12 A I believe I might have. I think I was one.</p> <p>13 Q Okay. Did you ever sign any checks in May</p> <p>14 of 2018?</p> <p>15 A I don't think so, no.</p> <p>16 Q Okay. So where -- did you have an</p> <p>17 understanding as -- as these first discussions</p> <p>18 occurred with Rick and Gloria that you understood</p> <p>19 were occurring, did you have an understanding where</p> <p>20 Ronnie was living?</p> <p>21 A I believe he was working for another company</p> <p>22 in Northern California, I believe.</p> <p>23 Q Which company was that?</p> <p>24 A MLU.</p> <p>25 Q I'm sorry?</p>
<p style="text-align: right;">Page 23</p> <p>1 Q Who were the other officers, if any, at the</p> <p>2 time this discussion about hiring Ronnie occurs?</p> <p>3 A I think just my mom was the president, and I</p> <p>4 was the corporate secretary.</p> <p>5 Q Okay.</p> <p>6 A I believe that's all that -- yeah, around</p> <p>7 that time.</p> <p>8 Q Okay. So to your knowledge, there was no</p> <p>9 vice presidents --</p> <p>10 A No.</p> <p>11 Q -- is that correct?</p> <p>12 A No.</p> <p>13 Q Was there a treasurer?</p> <p>14 A It could have been my mom, but I'm not -- I</p> <p>15 don't recall.</p> <p>16 Q Who signed the checks in May of 2018?</p> <p>17 A My mom.</p> <p>18 Q She signed all the checks?</p> <p>19 A Yes.</p> <p>20 Q In other words, payroll for, let's say,</p> <p>21 hundreds of people, she would always sign all</p> <p>22 checks?</p> <p>23 A Yes, her signature was on them, yes.</p> <p>24 Q Well, I know signature could be on them, but</p> <p>25 was the signature a -- a -- a image that was affixed</p>	<p style="text-align: right;">Page 25</p> <p>1 A MLU.</p> <p>2 Q MLU?</p> <p>3 A Uh-huh.</p> <p>4 Q Where was he living while he was working for</p> <p>5 MLU?</p> <p>6 A I believe it was Northern California.</p> <p>7 Q Did you ever hear any reference to Ronnie</p> <p>8 living in Florida in May of 2018?</p> <p>9 A I believe he was, um, going to, I think,</p> <p>10 move there.</p> <p>11 Q When you say Northern California, what city</p> <p>12 in Northern California did you have an understanding</p> <p>13 he was living in?</p> <p>14 A You know, I don't -- I don't know the exact</p> <p>15 city. Sorry.</p> <p>16 Q Was it Sacramento?</p> <p>17 A No, I don't believe it was Sacramento.</p> <p>18 Q San Francisco?</p> <p>19 A No.</p> <p>20 Q Okay.</p> <p>21 A I don't know if it was Roseville, Rocklin.</p> <p>22 I'm so sorry. I don't remember.</p> <p>23 Q That's okay. Roseville. So that's -- is</p> <p>24 that -- what county is that? Do you recall the</p> <p>25 county?</p>



<p style="text-align: right;">Page 26</p> <p>1 A Oh, no.</p> <p>2 Q Okay.</p> <p>3 A I just remember they lived in an apartment,</p> <p>4 I want to say.</p> <p>5 Q Okay. Had you ever met Ronnie prior to May</p> <p>6 of 2018?</p> <p>7 A No.</p> <p>8 Q Had you ever spoken with him on the phone</p> <p>9 prior to May of 2018?</p> <p>10 A No.</p> <p>11 Q Did you ever speak with him in the presence</p> <p>12 of your mother while she was on the phone with</p> <p>13 Ronnie prior to May of 2018?</p> <p>14 A No.</p> <p>15 Q Did you ever speak with her where you were</p> <p>16 in the presence of your brother, Rick, when he spoke</p> <p>17 with Ronnie prior to May of 2018?</p> <p>18 A No.</p> <p>19 Q Okay. Now, at some point, did you learn</p> <p>20 that your brother had hired Ronnie?</p> <p>21 A Yes.</p> <p>22 Q When did you learn that he had hired Ronnie?</p> <p>23 A Probably sometime around 2018 when he was</p> <p>24 hired.</p> <p>25 Q If I give you a date of, say, May of 2018,</p>	<p style="text-align: right;">Page 28</p> <p>1 industry?</p> <p>2 A Like I said, I didn't know very much. Just</p> <p>3 that he's been around in the industry. He had, I</p> <p>4 think, a family business, I think, in --</p> <p>5 (unintelligible_</p> <p>6 THE REPORTER: I'm sorry. Repeat that last</p> <p>7 part.</p> <p>8 THE WITNESS: I think it's called Disaster</p> <p>9 Recovery. He was part of -- he was part of bark</p> <p>10 beetle.</p> <p>11 BY MR. CATANZARITE:</p> <p>12 Q Do you recall meeting Ronnie when he came to</p> <p>13 work at Mowbray's after being hired by Rick?</p> <p>14 A Yes.</p> <p>15 Q And how did that first encounter go, so to</p> <p>16 speak?</p> <p>17 A You know, I don't remember the first</p> <p>18 encounter. Yeah, I can't -- I don't recall exactly.</p> <p>19 Q Did -- did Ronnie -- did Ronnie join</p> <p>20 Mowbray's with his wife, Phyllis?</p> <p>21 A Yes.</p> <p>22 Q Did you meet her, as well?</p> <p>23 A Yes.</p> <p>24 Q Okay. Now, I want to take you back to that</p> <p>25 timing. So let's say early 2018 before this -- the</p>
<p style="text-align: right;">Page 27</p> <p>1 does that sound familiar to you?</p> <p>2 A It might have. I don't remember the exact</p> <p>3 date. I'm sorry.</p> <p>4 Q Okay. Was your -- was your brother, Rick,</p> <p>5 excited about the hiring of Ronnie?</p> <p>6 A Um, yeah.</p> <p>7 Q Was your mother, Gloria, excited about the</p> <p>8 hiring of Ronnie?</p> <p>9 A Um, I think she was, yeah, good with it.</p> <p>10 Q Were you excited about the hiring of Ronnie?</p> <p>11 A Yeah --</p> <p>12 Q Why?</p> <p>13 A -- I would say. Just that, you know, he had</p> <p>14 a lot of -- like I said, he's been around the</p> <p>15 business for a while. Um, yeah, he was just known</p> <p>16 in the industry.</p> <p>17 Q All right. And I don't want to put words in</p> <p>18 your mouth, but when you say he's known in the</p> <p>19 industry, did he have a good reputation in the</p> <p>20 industry?</p> <p>21 A I believe so, yes.</p> <p>22 Q Okay. All right. What what's your</p> <p>23 understanding in May of 2018 as this excitement with</p> <p>24 respect to his hiring by Rick is occurring? What is</p> <p>25 your understanding of Ronnie's reputation in the</p>	<p style="text-align: right;">Page 29</p> <p>1 discussion of Ronnie is occurring, do you have an</p> <p>2 understanding what the financial condition was of</p> <p>3 Mowbray's at that time? I'm sorry. I said</p> <p>4 Mowbray's. Let me rephrase the question.</p> <p>5 Do you have an understanding of what the</p> <p>6 financial condition of MTS was in April of 2018?</p> <p>7 A I don't recall exactly, you know, how much,</p> <p>8 you know, we had, but yeah. I don't recall.</p> <p>9 Q Prior to April of 2018, did you routinely</p> <p>10 receive financial statements from anyone concerning</p> <p>11 MTS's activity?</p> <p>12 A I would never really receive them. Our</p> <p>13 accountant would take care of all that.</p> <p>14 Q Okay. So I want to be clear. Between 2002</p> <p>15 and 2018, you don't have a recollection of looking</p> <p>16 at financial statements from -- for MTS?</p> <p>17 A I might have looked at them, but I don't</p> <p>18 remember -- I can't recall what they were.</p> <p>19 Q And do you know what financial statements</p> <p>20 are?</p> <p>21 A Yes.</p> <p>22 Q Okay. What are they?</p> <p>23 A They're just, like, to show your profit,</p> <p>24 your loss, or how much money you have.</p> <p>25 Q Uh-huh. Okay. So are you familiar with</p>

Page 30

1 something called an income statement which would
2 show the revenues and expenses for the period?
3 A Yes.
4 Q Okay. Are you familiar with something
5 called a balance sheet which would show your assets
6 and your liabilities and your equity during --
7 A Yes, I've seen those, yes.
8 Q You've seen those.
9 A Yes.
10 Q Okay. So when I ask what you recall about
11 the financial condition of Mowbray's in 2018, do you
12 know what the profit and loss was year-to-date April
13 of 2018?
14 A You know, I'm so sorry. I couldn't recall
15 offhand what it was.
16 Q Okay. Do you know what the balance sheet
17 condition was as of 12/31/2017?
18 A No, I don't. I don't recall what that was.
19 Q Okay. And at that -- and at that point in
20 2018, your mom is the sole shareholder, if I
21 understand your testimony, of MTS?
22 A Yes.
23 Q Okay. All right. Did anyone say in any
24 fashion that MTS was having financial difficulty in
25 the first quarter of 2018?

Page 31

1 A I don't recall. I don't -- I don't believe
2 so.
3 Q Do you recall if anyone reported to you or
4 to your mother or to Rick or to others in your
5 presence what the financial condition was of MTS in
6 May of 2018?
7 A Yeah, I don't recall.
8 Q When you say you don't recall, does that
9 mean someone may have said something, you recall
10 something being said, but you just can't place it or
11 provide any specifics?
12 A Yeah, I might have -- yeah, I just don't --
13 Q Fair enough. Fair enough. With respect to
14 that, is there a gentleman named Alan Phaing? Does
15 he work for MTS?
16 A Yes.
17 Q What is -- in April of 2018, what was
18 Mr. Phaing's duties and responsibilities?
19 A He was our controller, our accountant. He
20 took care of all our financials and --
21 Q Okay. And was Alan at the tip of that
22 pyramid of the accounting function? In other words,
23 he was the guy who would have assembled a collective
24 data from accounts receivable, accounts payable, and
25 payroll and come up with the financial statements?

Page 32

1 Is that the gentleman?
2 A Yeah, he would, and then we had our CPA.
3 Q Okay. Who were the CPAs at that time?
4 A It was Soren McAdam. Soren McAdam, yeah.
5 Q Okay. And what city are they in?
6 A I believe it's Redlands.
7 Q Okay. So Alan Phaing would handle the
8 internal function which would include preparation of
9 profit and loss statements and balance sheets and
10 other accounting functions and work with the
11 accounting firm -- the CPAs in Redlands in
12 generating final financial statements; is that
13 correct?
14 A Yes.
15 Q Okay. Now, with -- with respect to Alan's
16 role, did Alan say to you or anyone in your presence
17 that in 2017 what's your break-even analysis
18 required in terms of collections?
19 A You know, I'm so sorry. I don't recall. I
20 don't -- yeah.
21 Q Okay. Did -- did Alan or did anyone -- did
22 anyone relate to you -- whether or not it was Alan,
23 did anyone relate to you what the break-even
24 requirements were for collections into the company
25 to pay its bills in 2017 on a monthly basis?

Page 33

1 A You know, I'm so sorry. I didn't take care
2 of all that, so I --
3 Q Okay. Fair enough. You can only tell me
4 what you know.
5 A I know. Sorry.
6 Q That's okay. Well, we have -- we have a
7 deposition of -- of Ricky who I gather will go
8 through a number of these things, but I want to get
9 your background and your knowledge; okay?
10 A Okay.
11 Q Now, with respect to early 2018, did anyone
12 say to you in your presence -- or did you overhear
13 discussions about what the break-even analysis was
14 of MTS in 2018?
15 A You know, I don't remember. I don't recall.
16 Q Do you have any recollection that in 2018 at
17 the time that Rick hires Ronnie Jordan that the
18 break-even analysis reported by Alan Phaing was \$6
19 million per month?
20 A I would agree with that if that's what was
21 testified, yes.
22 Q Okay. Well, I'm not -- I'm not putting
23 words in your mouth. I want to understand what --
24 you heard that number because I don't want you to
25 simply adopt what I question you on because, you

<p style="text-align: right;">Page 34</p> <p>1 know, if it's not accurate -- you either heard it or 2 you didn't hear it.</p> <p>3 A I know. Okay. You know, I'm so sorry. 4 Yeah, I don't recall what -- I didn't know what -- 5 no, I don't -- I don't recall.</p> <p>6 Q Okay. So -- so what I'm coming to now is 7 was the purpose of -- of Rick and Gloria deciding to 8 hire Ronnie Jordan to help the company grow so that 9 it could cover its operating expenses?</p> <p>10 A That was one of them, yes.</p> <p>11 Q Okay. What were the others -- other 12 reasons?</p> <p>13 A Well, we did have a CEO that was Mike Neal. 14 I think that he lived in Arizona, and he would -- 15 she wasn't living in California, so there was an 16 issue there. So I believe we were having some 17 issues when he was the then-CEO at that time.</p> <p>18 Q I see. So Mike Neal. And did you -- had 19 you ever, shall we say, gotten together with Mike 20 Neal? Did you -- did you know who he was and talked 21 with him --</p> <p>22 A Yes.</p> <p>23 Q -- at the time?</p> <p>24 A Yes.</p> <p>25 Q Okay. Who was getting the business? In</p>	<p style="text-align: right;">Page 36</p> <p>1 Q So -- so you could appreciate -- everyone 2 can appreciate that if people are trimming or 3 cutting trees, that how fast you do that in a safe 4 manner --</p> <p>5 A Yes.</p> <p>6 Q -- will affect your profitability and your 7 revenue; correct?</p> <p>8 A Definitely, yes.</p> <p>9 Q Okay. So who was -- who was -- is it fair 10 to say that up to the time Ronnie's brought on 11 board, that Rick, your brother, is responsible for 12 making certain that the trees -- that the tree 13 process of cutting and cleanup and everything else 14 with utilities is handled properly?</p> <p>15 A No, I wouldn't say he was the only one in 16 charge. There was other ones. But I wouldn't say 17 he was the only one specifically in charge of that, 18 no.</p> <p>19 Q Okay. And the other two gentlemen you told 20 me about was Ignacio and Marcos; correct?</p> <p>21 A Yeah. I think there was also Jesus 22 Velasquez in Sacramento.</p> <p>23 Q Okay. Any others any others?</p> <p>24 A Not that I can recall offhand, but those 25 were the main ones.</p>
<p style="text-align: right;">Page 35</p> <p>1 other words, like any business, someone's gotta 2 bring in the business; right? And your business is 3 selling your tree service functions to utilities; 4 correct?</p> <p>5 A Right.</p> <p>6 Q Okay.</p> <p>7 A We always had our contract for Edison. We 8 received that in -- yeah, we had that prior years. 9 Still have it. I believe we were doing work for 10 PG&E, but I don't think we had a direct contract 11 with them.</p> <p>12 So I just think our main -- our main 13 contract at that time -- oh, I think we had some 14 Sacramento SMUD. So we already had those contracts 15 in place.</p> <p>16 Q Okay. How familiar are you with the process 17 of generating revenue by MTS's workers in the field? 18 In other words, how did they generate revenue? Are 19 you familiar with the billing and how it -- sort of 20 how it comes together?</p> <p>21 A I mean, they trim trees. It could be a unit 22 lump sum, and then we invoiced it, but I really 23 wasn't involved in the invoicing.</p> <p>24 Q Okay.</p> <p>25 A But yeah.</p>	<p style="text-align: right;">Page 37</p> <p>1 Q Okay. And Ignacio, can I have the spelling 2 of Ignacio's last name, please?</p> <p>3 A It's Huerta, H-U-E-R-T-A.</p> <p>4 Q And how about Marcos's last name, please? 5 Spell it.</p> <p>6 A Rodriguez, R-O-D-I-G-U-E-Z [sic].</p> <p>7 Q Thank you. Okay. Now, with respect to 8 Ronnie's hire by Rick, are you familiar with the 9 compensation package?</p> <p>10 A His?</p> <p>11 Q Ronnie's.</p> <p>12 A I wasn't aware of it until later on.</p> <p>13 Q Okay. Okay. You say I wasn't aware of it 14 until later on. How much later?</p> <p>15 A I don't recall exactly what it was, but it 16 was probably when I was given the contract to have 17 my mom sign.</p> <p>18 Q Okay. Contract to have your mom sign. When 19 was your mom given a contract to sign? Do you 20 recall?</p> <p>21 A I know they had brought it to me a few times 22 to have her sign it, and I let -- I just let them 23 know that her attorneys would have to look that 24 over.</p> <p>25 Q Okay. Her attorneys would have to look that</p>



<p style="text-align: right;">Page 38</p> <p>1 over?</p> <p>2 A Yes.</p> <p>3 Q Which attorneys were those?</p> <p>4 A Stephen Cho and Michael Kim.</p> <p>5 Q Okay. All right. So you're familiar with</p> <p>6 the contract that is being -- it's a typed up</p> <p>7 contract; right?</p> <p>8 A Yes.</p> <p>9 Q Given to your mother that you brought to</p> <p>10 your mother to sign, prepare --</p> <p>11 A They brought it to me a few times and asked</p> <p>12 for me to have her sign, and, like, I would let them</p> <p>13 know that it would have to be looked over by her</p> <p>14 attorneys.</p> <p>15 Q Okay. All right. And the -- and her</p> <p>16 attorneys meaning your -- Gloria's attorneys were</p> <p>17 Stephen Cho, who happens to be with us today, and</p> <p>18 Michael Kim; correct?</p> <p>19 A Yes.</p> <p>20 Q All right. They were also the company MTS's</p> <p>21 attorneys or at least some of the main attorneys;</p> <p>22 correct?</p> <p>23 A Yes.</p> <p>24 Q Okay. Now, do you -- can you place the year</p> <p>25 that that contract is presented to your mother to</p>	<p style="text-align: right;">Page 40</p> <p>1 your mother to sign it?</p> <p>2 A Yes.</p> <p>3 Q Okay. So someone's bringing -- let me see</p> <p>4 if I can -- let me see if I can -- are you able --</p> <p>5 where are you talking to me from? Are you from home</p> <p>6 or --</p> <p>7 A You know, I'm so sorry. I'm from home</p> <p>8 because I've been sick this weekend, so I'm just on</p> <p>9 this laptop. I'm so sorry.</p> <p>10 Q Oh, well, you have -- so you need me to show</p> <p>11 you a document before you can tell me about it or</p> <p>12 can I send it to you and --</p> <p>13 A Sure, yeah. You can send it to my e-mail.</p> <p>14 Q Okay. Well, let me do that. I'll send it</p> <p>15 to you, and I'll send it to Mr. Cho at the same</p> <p>16 time.</p> <p>17 MR. CATANZARITE: Stephen, is that okay with</p> <p>18 you rather than sending it through chat?</p> <p>19 MR. CHO: That's fine. Any way you can</p> <p>20 share it on the -- on the board or --</p> <p>21 MR. CATANZARITE: I can share it on the</p> <p>22 screen. Let me try share screen. You know,</p> <p>23 sometimes it's harder and the witness says well, I'd</p> <p>24 like to see more of the document. Let me -- let me</p> <p>25 show you a document and see if this is the document</p>
<p style="text-align: right;">Page 39</p> <p>1 sign?</p> <p>2 A You know, I don't remember the exact time.</p> <p>3 I believe we were in the building that we were in</p> <p>4 before we moved to this one. I really can't recall</p> <p>5 the exact year.</p> <p>6 Q Can you give me a range or estimate?</p> <p>7 A I don't know if it was 2019.</p> <p>8 Q Okay.</p> <p>9 A I think it might have been -- I don't know</p> <p>10 if it was before COVID. I don't remember. Sorry.</p> <p>11 Q Okay. If I -- if I tell you that the</p> <p>12 contract -- that contract isn't signed until late</p> <p>13 2020, does that refresh your recollection?</p> <p>14 A I don't believe it was that one that was</p> <p>15 signed.</p> <p>16 Q Okay. Now, prior to that contract that you</p> <p>17 saw that you know is signed, what was the contract</p> <p>18 arrangement for compensation of Ronnie that was</p> <p>19 agreed to by Rick and Gloria?</p> <p>20 A You know, I really don't remember exactly</p> <p>21 what was on -- I don't remember the -- all of it.</p> <p>22 Like I said, it was a one page, and it -- they --</p> <p>23 like I said, they kept on asking me to have my mom</p> <p>24 -- my mother sign it.</p> <p>25 Q Okay. It was one page, and they kept asking</p>	<p style="text-align: right;">Page 41</p> <p>1 you're referring to.</p> <p>2 BY MR. CATANZARITE:</p> <p>3 Q Can you see that document?</p> <p>4 A Yes.</p> <p>5 Q Okay. Is that the document that you were</p> <p>6 describing as a one-page document that your mother</p> <p>7 was being asked to sign?</p> <p>8 A Yes.</p> <p>9 Q All right. Who was asking your mother to</p> <p>10 sign that document?</p> <p>11 A I -- I believe that maybe Ronnie gave it to</p> <p>12 me, maybe Phyllis, and also their son-in-law,</p> <p>13 Josh -- oh, my goodness. I forgot his last name.</p> <p>14 Gosh. I'm so sorry. I forgot his last name.</p> <p>15 Q That's okay. So his son-in-law, Josh; is</p> <p>16 that correct?</p> <p>17 A Yes.</p> <p>18 Q Okay. And Josh was working for the -- for</p> <p>19 MTS, also; correct?</p> <p>20 A Yes.</p> <p>21 Q He was safety -- in charge of safety?</p> <p>22 A Yes.</p> <p>23 Q Okay. So these -- or one or more of these</p> <p>24 folks were asking -- were tendering this document to</p> <p>25 you to ask you to have Gloria sign it; correct?</p>



<p style="text-align: right;">Page 42</p> <p>1 A Yes.</p> <p>2 Q All right. Did you read it when you</p> <p>3 received it?</p> <p>4 A I don't believe I really did look at it. To</p> <p>5 be honest, I really didn't.</p> <p>6 Q Okay. Can you tell me did Rick give this</p> <p>7 document to you, as well?</p> <p>8 A No, never.</p> <p>9 Q I'm going to mark this as Exhibit 4.</p> <p>10 (Whereupon Exhibit 4 was marked for</p> <p>11 identification.)</p> <p>12 MR. CATANZARITE: And, Kieu, I'll send this</p> <p>13 to you as a separate document; okay? So we'll call</p> <p>14 this Exhibit 4. It is identified as the one page</p> <p>15 May 28, 2018, typewritten agreement with a signature</p> <p>16 line for Ronnie and Phyllis Jordan and Mowbray's</p> <p>17 authorized signatures one and two.</p> <p>18 BY MR. CATANZARITE:</p> <p>19 Q Okay. So can you place the year in which</p> <p>20 you received this document?</p> <p>21 A I -- it probably was -- I don't -- I don't</p> <p>22 think it was 2018. I'm thinking -- you know, I</p> <p>23 don't really know. I could see what office we were</p> <p>24 in, but I don't really recall the exact date. I'm</p> <p>25 sorry.</p>	<p style="text-align: right;">Page 44</p> <p>1 from Ronnie and/or Phyllis and/or Josh; correct?</p> <p>2 A Well, I can't really say the exact date.</p> <p>3 I'm sorry. I can't. I just remember where I was at</p> <p>4 and when they would bring it to me and ask me for my</p> <p>5 mother to sign. I can't even tell you what the date</p> <p>6 was.</p> <p>7 Q Yeah, I'm not asking you for the date. I</p> <p>8 understand that you can't do that. I'm trying to</p> <p>9 place it. If we say the move is on a date that</p> <p>10 we'll be able to identify by talking to others,</p> <p>11 perhaps, or we'll see another document, you</p> <p>12 estimated that approximately one year prior to that</p> <p>13 move, you had seen this document; correct?</p> <p>14 A I don't know if it was a year or -- like I</p> <p>15 said, I can't remember the year. I'm sorry.</p> <p>16 Q Can you give me a range or estimate? Six to</p> <p>17 nine months, six months to a year before the move?</p> <p>18 A Could be.</p> <p>19 Q Okay. So we -- are you saying could be as</p> <p>20 an estimate -- a best estimate?</p> <p>21 A Yeah, I'd say best estimate, yes.</p> <p>22 Q Thank you so much.</p> <p>23 Q Did you hand the document to Gloria?</p> <p>24 A Yes, I believe on occasion I did.</p> <p>25 Q Okay.</p>
<p style="text-align: right;">Page 43</p> <p>1 Q When you say you can see what office you</p> <p>2 were in, does that mean you have a recollection of</p> <p>3 receiving this when you were in the office before</p> <p>4 you moved?</p> <p>5 A Yes.</p> <p>6 Q Okay. And when did you -- when did the</p> <p>7 company, MTS, move into its new office?</p> <p>8 A I believe it was in 20 -- 2019.</p> <p>9 Q Okay.</p> <p>10 A 2020.</p> <p>11 Q Well, whenever --</p> <p>12 A I'm so sorry.</p> <p>13 Q Yeah, whenever the operations changed to the</p> <p>14 new location, you have a recollection of having</p> <p>15 received this document from Ronnie and/or Phyllis</p> <p>16 and/or Josh prior to that move; is that correct?</p> <p>17 A Yes.</p> <p>18 Q How much time prior to the move do you</p> <p>19 recall first seeing this document?</p> <p>20 A I really -- I can't recall the year. I</p> <p>21 can't remember the exact date.</p> <p>22 Q You can't remember an exact date, but your</p> <p>23 best estimate is approximately one year before the</p> <p>24 move into the new offices, you received -- first</p> <p>25 received Exhibit 4, the May 28th typewritten page</p>	<p style="text-align: right;">Page 45</p> <p>1 A I might have sent it to her lawyers --</p> <p>2 Q Okay.</p> <p>3 A -- first, and then my mom was aware that --</p> <p>4 that's what she wanted me to do.</p> <p>5 Q Okay. So your recollection is that you</p> <p>6 handed this document, Exhibit 4, to your lawyers,</p> <p>7 Mr. Kim and/or Mr. Cho for review, and you may have</p> <p>8 handed it to your mother at the same -- at or about</p> <p>9 the same time; is that correct?</p> <p>10 A Yes.</p> <p>11 Q All right. And what did your mother say</p> <p>12 about the document when she reviewed it?</p> <p>13 A I don't recall exactly what she said, just</p> <p>14 that she had to talk to, like I said, her lawyers</p> <p>15 about it.</p> <p>16 Q Okay. So you have a recollection, I take</p> <p>17 it, that you spoke with your mother about the</p> <p>18 one-page agreement, that she had reviewed it, and</p> <p>19 said she had to talk to her lawyers; is that</p> <p>20 correct?</p> <p>21 A Yes.</p> <p>22 Q Did she say anything else? Did she say</p> <p>23 anything about the terms that are contained in the</p> <p>24 document?</p> <p>25 A Um, at that time, I really -- I don't know</p>

<p style="text-align: right;">Page 46</p> <p>1 if she had some issues with it, but I can't recall</p> <p>2 exactly, yeah, what they were.</p> <p>3 Q Your best recollection is your mother may</p> <p>4 have had some issues with it, but you can't recall</p> <p>5 exactly what they were; correct?</p> <p>6 A Yes.</p> <p>7 Q Okay. How would you characterize your</p> <p>8 mother in this time period, 2018? What type of a</p> <p>9 lady was she?</p> <p>10 A She was a very strong lady, she was tough.</p> <p>11 Q Yeah. All right. Well, I imagine she was.</p> <p>12 Your father was injured in 1993 and never recovered.</p> <p>13 She was taking care of him, I understand, in the</p> <p>14 house contrary of nurses, correct, and doctors?</p> <p>15 A Yes.</p> <p>16 Q And that's a difficult thing to do to take</p> <p>17 care of a loved one, her husband, in the house;</p> <p>18 correct?</p> <p>19 A Yeah.</p> <p>20 Q In other words, your mom was so tough, she</p> <p>21 wouldn't put him into any nursing home or anything.</p> <p>22 She was going to take care of him; correct?</p> <p>23 A Yes.</p> <p>24 Q Okay. And -- and at the same time, she's</p> <p>25 president of the business -- a successful business,</p>	<p style="text-align: right;">Page 48</p> <p>1 them stand out in your mind? In other words,</p> <p>2 witnesses can have a recollection of hearing certain</p> <p>3 things, but sometimes something will stand out in</p> <p>4 their mind.</p> <p>5 Do any of the conversations that your mother</p> <p>6 reported to you about her communication with Alan</p> <p>7 stand out in your mind?</p> <p>8 A Um, no, not that I recall. Like I said,</p> <p>9 she -- I can't -- no, not at this time. I can't</p> <p>10 really recall. They might have talked about --</p> <p>11 yeah, I really don't recall exactly.</p> <p>12 Q I want to come back now to your mother's</p> <p>13 reaction to the one-page agreement that appears in</p> <p>14 Exhibit 4 --</p> <p>15 A Yeah.</p> <p>16 Q -- the May 28, 2018 one page typewritten</p> <p>17 document. Your mother -- you've told us that your</p> <p>18 mother's strong-willed; correct?</p> <p>19 A Uh-huh.</p> <p>20 Q You'll have to answer audibly yes or no,</p> <p>21 please.</p> <p>22 A Yes.</p> <p>23 Q Okay. Your mother is savvy about what's</p> <p>24 going on in the business, the revenue and expenses,</p> <p>25 having talked with her comptroller; correct?</p>
<p style="text-align: right;">Page 47</p> <p>1 MTS; correct?</p> <p>2 A Yes.</p> <p>3 Q She was also owner of multiple pieces of</p> <p>4 real estate; correct?</p> <p>5 A Yes.</p> <p>6 Q Okay. Fair to say she's handling millions</p> <p>7 of dollars; correct?</p> <p>8 A Yeah. Yes.</p> <p>9 Q And did you -- was your mother -- by your</p> <p>10 observation, was your mother savvy? In other words,</p> <p>11 she knew what was going on, she knew what the fiscal</p> <p>12 cash flows and business operations were, and what</p> <p>13 she could spend when she could spend money and when</p> <p>14 she couldn't spend money. Would that be fair to</p> <p>15 say?</p> <p>16 A Yeah, when she would have, yeah,</p> <p>17 conversations with Alan, yes.</p> <p>18 Q Okay. Did she ever have any conversations</p> <p>19 with Alan in your presence?</p> <p>20 A Um, might have.</p> <p>21 Q Okay. Did she ever say to you or report to</p> <p>22 you conversations that she had had with Alan -- Alan</p> <p>23 Phaing?</p> <p>24 A Yeah, I'm sure she has, yes.</p> <p>25 Q Okay. Do you recall any of them? Do any of</p>	<p style="text-align: right;">Page 49</p> <p>1 A Yeah.</p> <p>2 Q And she would not -- if she disagreed with</p> <p>3 something, she would tell you about it; correct?</p> <p>4 A Yes.</p> <p>5 Q And she didn't say anything specifically</p> <p>6 about this one-page document that she disagreed</p> <p>7 with, did she?</p> <p>8 A Um, I don't know if she said anything</p> <p>9 about -- she might have said that, yeah, she wasn't</p> <p>10 okay with some of the things. That's why she had to</p> <p>11 talk to her lawyers.</p> <p>12 She wasn't okay with -- I don't know the</p> <p>13 specifics, but -- I don't know if she was okay with</p> <p>14 the vehicles, the -- I don't know -- the houses.</p> <p>15 She just -- yeah, I mean, I really don't know. She</p> <p>16 just had issues with it. That's why she had to talk</p> <p>17 to her lawyers.</p> <p>18 Q Okay. I understand that, and I got that. I</p> <p>19 gleaned that from your earlier reporting to us of</p> <p>20 what your mother said. I'm searching for if there</p> <p>21 is anything that she said no way, no how I didn't</p> <p>22 agree to that.</p> <p>23 A Um, I think for sure she wasn't probably</p> <p>24 okay with the ten percent --</p> <p>25 Q Okay.</p>

Page 50

1 A -- or the -- I think that was discussed
2 later. Maybe the -- the vehicles, the -- but then,
3 yeah, I think there was a few things that she wasn't
4 okay with.

5 Q Okay. And when you say I think she said,
6 are you saying -- do you have a specific
7 recollection of the words she used to convey to you
8 what you just said?

9 A Yes, I think she had more conversations,
10 like I said, with our lawyers about that --

11 Q Fair enough.

12 A -- when they talked about it and then they
13 had came to the agreement of the contract which
14 Ronnie signed. So I feel like she had those
15 conversations.

16 Q Okay.

17 A Like I said --
18 (Technical glitch. Inaudible.)

19 THE REPORTER: I'm sorry. My audio cut out
20 for a second. I didn't hear the last part of the
21 question -- I mean answer.

22 THE WITNESS: I believe that she just was
23 not okay with some of the things. That's why she
24 wanted to go over it with her lawyers to agreement
25 for where they could come to agreement with Ronnie.

Page 51

1 MR. CATANZARITE: Okay.

2 BY MR. CATANZARITE:

3 Q So I'm going to go back to the specifics.
4 What did she specifically say, if anything, about
5 the ten percent?

6 A Um, I believe she wasn't okay with that.

7 Q Well, when you say someone's not okay with
8 it, they're not okay with what the ten percent
9 applies to? Is that what she was not okay with?

10 A Yes, I think so, yes. She wasn't okay with
11 that.

12 Q Okay. So she was okay to using ten percent
13 but not what it applied to. Is that your
14 understanding?

15 A No. I don't know exactly what it was. Just
16 said she had issues with the ten percent of the --

17 Q All right. Did she think the number was
18 less than ten percent, did she think the number was
19 no ten percent, did she think it was five percent,
20 eight percent? Did she say anything?

21 A I think that she just wasn't okay with it,
22 period. I don't know. She was just -- she was okay
23 with not the ten percent.

24 Q Okay. So -- so now tell me -- tell me what
25 reporting did you -- you or Gloria have with Ronnie

Page 52

1 about Gloria's supposed disagreement with the ten
2 percent.

3 A I don't think that that was spoken to Ronnie
4 at all. Like I said, it was spoken with our
5 lawyers, and she wasn't okay with it.

6 Q Okay. So now let's go -- let's go back to
7 did she ever -- did she report to you that she ever
8 had anyone who -- who she had entered into a
9 contractual agreement that offered a percentage of
10 profits?

11 A I don't -- I'm not sure about that.

12 Q Okay. Are you aware of anyone that works
13 for the company -- any executive that works for the
14 company that had a percentage of profits?

15 A No, I'm not.

16 Q Okay. Is that because your mother would
17 never agree to such an agreement?

18 A I'm not sure. Just for this specific, the
19 ten percent, she was not okay with that. I'm not
20 sure about prior or -- just I know that she referred
21 to something that she wasn't okay with that.

22 That's, like I said, she spoke to her
23 lawyers, and I think that they had come to
24 agreement. I'm not sure what that was, but she was
25 not okay with the ten percent. No, she wasn't.

Page 53

1 Q Okay. So now what I'm asking is you
2 understood as you handed this letter to your mother
3 that Ronnie and Phyllis understood that Ronnie was
4 received ten percent of profits; correct?

5 A I think I learned that after.

6 Q Okay.

7 A Or the discussion, like I said.

8 Q Okay. So did anyone report to Ronnie that
9 there's a disagreement as to the ten percent?

10 A I'm not sure.

11 Q Okay. Now, your mother -- would it be fair
12 to say your mother is strong but fair?

13 A Um, yeah. Yes.

14 Q Would your mother go back on her word? I
15 mean, if she agreed to something or if Rick had
16 agreed to something on her behalf, would she try to
17 change it after someone has put a year or more at
18 service to the company which she --

19 MR. CHO: Objection. Lacks foundation.
20 Incomplete hypothetical. Calls for speculation.
21 Answer if you know.

22 THE WITNESS: Can you repeat that?

23 MR. CATANZARITE: Kieu, can you read it
24 back?

25 THE REPORTER: Would your mother go back on

<p style="text-align: right;">Page 54</p> <p>1 her word? I mean, if she agreed to something or if</p> <p>2 Rick had agreed to something on her behalf, would</p> <p>3 she try to change it after someone has put a year or</p> <p>4 more at service to the company which she -- and it</p> <p>5 got cut off with the objection.</p> <p>6 THE WITNESS: I think you'd have to ask her</p> <p>7 that.</p> <p>8 MR. CATANZARITE: Okay.</p> <p>9 THE WITNESS: I don't think -- first of all,</p> <p>10 Rick would have no authority to do that.</p> <p>11 BY MR. CATANZARITE:</p> <p>12 Q Why do you say that?</p> <p>13 A Because she's -- she had the last say so.</p> <p>14 That's why they knew that she needed to sign this.</p> <p>15 Q Who's the they knew?</p> <p>16 A Phyllis, Ronnie.</p> <p>17 Q They knew what?</p> <p>18 A That my mom had to be okay with this and</p> <p>19 sign it.</p> <p>20 Q Well, it doesn't have Gloria on here as the</p> <p>21 signature.</p> <p>22 A Well, they gave it to me and they would say</p> <p>23 can you please have your mother sign this.</p> <p>24 Q Okay.</p> <p>25 MR. CHO: Hey, Ken --</p>	<p style="text-align: right;">Page 56</p> <p>1 communicating with Ronnie. Was your mother</p> <p>2 communicating with Ronnie directly?</p> <p>3 A I don't believe so. I can't recall.</p> <p>4 Q All right. And so Rick's communicating with</p> <p>5 Ronnie and getting Ronnie to relocate. You</p> <p>6 understand Ronnie relocates -- Ronnie becomes</p> <p>7 employed.</p> <p>8 You may not understand where he relocated</p> <p>9 from, that's fair, but he became employed by the</p> <p>10 company; correct?</p> <p>11 A Yes.</p> <p>12 Q And you're aware of an announcement that</p> <p>13 went out because he became employed by the company;</p> <p>14 correct?</p> <p>15 A Yes.</p> <p>16 Q Now, when you saw this ten percent referred</p> <p>17 to in this document, did you all talk with Rick to</p> <p>18 figure out what he had said?</p> <p>19 A I'm not sure. My mom had that conversation.</p> <p>20 I -- I'm not sure.</p> <p>21 Q Is it fair -- at this time, do you recall</p> <p>22 any conversations you had with Rick or that you</p> <p>23 overheard anyone have with Rick about the ten</p> <p>24 percent?</p> <p>25 A No, I don't recall.</p>
<p style="text-align: right;">Page 55</p> <p>1 THE WITNESS: Multiple times.</p> <p>2 MR. CHO: Hold on. Hold on a second. Ken,</p> <p>3 it's been about an hour seven minutes. When you</p> <p>4 think it's appropriate, I'd like a short break.</p> <p>5 MR. CATANZARITE: Sure. Give me a couple</p> <p>6 minutes on this subject, and then we'll take a</p> <p>7 break, if that's okay with the witness.</p> <p>8 MR. CHO: Yeah, that's fine.</p> <p>9 MR. CATANZARITE: Is that okay with you,</p> <p>10 Robin? Is that okay with you, Robin, a few more</p> <p>11 minutes on this subject?</p> <p>12 THE WITNESS: Yeah, that's fine.</p> <p>13 MR. CATANZARITE: Okay. Thank you.</p> <p>14 BY MR. CATANZARITE:</p> <p>15 Q So I want to understand about this document</p> <p>16 and the process. You say Rick didn't have the</p> <p>17 authority. What authority -- why do you say that if</p> <p>18 Rick is talking to Ronnie Jordan? You understood he</p> <p>19 was talking to Ronnie Jordan; correct?</p> <p>20 A Yes.</p> <p>21 Q Okay. And you understand that you were</p> <p>22 trying to recruit Jordan to be CEO and president of</p> <p>23 the company; correct?</p> <p>24 A Yes.</p> <p>25 Q Okay. So you -- he was -- he, Rick, was</p>	<p style="text-align: right;">Page 57</p> <p>1 Q Okay.</p> <p>2 MR. CATANZARITE: Let's take -- is ten</p> <p>3 minutes okay with you, Stephen?</p> <p>4 MR. CHO: Yes, that sounds great. Thank</p> <p>5 you.</p> <p>6 MR. CATANZARITE: Robin, is that okay with</p> <p>7 you?</p> <p>8 THE WITNESS: Yes. Thank you.</p> <p>9 MR. CATANZARITE: Okay. So let's come back</p> <p>10 at 10:20, please.</p> <p>11 THE WITNESS: Okay.</p> <p>12 THE VIDEOGRAPHER: Going off the record at</p> <p>13 10:09 a.m.</p> <p>14 MR. CATANZARITE: Thank you.</p> <p>15 (Whereupon a short break was taken</p> <p>16 from the proceedings.)</p> <p>17 THE VIDEOGRAPHER: The time is 10:24 a.m.</p> <p>18 We're back on the video record.</p> <p>19 MR. CATANZARITE: Okay.</p> <p>20 BY MR. CATANZARITE:</p> <p>21 Q Robin, you understand you're still under</p> <p>22 oath.</p> <p>23 A Yes.</p> <p>24 Q All right. Robin, tell me when you had this</p> <p>25 recollection of speaking with Gloria about</p>

Page 58

1 Exhibit 4. And I can put that back up if you need
2 that. Are you able to see Exhibit 4 again?
3 A Yes.
4 Q Okay. Can you tell me -- I want to be
5 clear. You didn't talk with Gloria about Rick's
6 discussions with Ronnie, is that correct, concerning
7 his employment?
8 A Right. Correct.
9 Q Okay. Can you tell me why -- if Rick was
10 hiring Ronnie, why you and Gloria would not talk to
11 Rick?
12 A I -- I'm not sure if my mom spoke to him
13 about it. She may have, but -- yeah, I'm not sure.
14 She might have spoken, I'm sure, with him, but I --
15 I wasn't present.
16 Q Okay.
17 A Or I might have been. I can't recall
18 exactly.
19 Q Okay. So now let's talk about what you
20 recall about communications that you overheard or --
21 between Ronnie and Gloria. Do you recall any
22 conversations that you observed between Gloria and
23 Ronnie or Gloria and Phyllis?
24 A No. I'm sorry. I didn't ever recall -- I
25 don't recall those.

Page 59

1 Q Okay. Do you recall in May of 2019
2 purchasing a house on Lucas Lane?
3 A Yes.
4 Q And when I say you, I mean Mowbray's --
5 MT -- I wrote this down and I -- oh, MWP, Mowbray's
6 Waterman Property. Forgive me. MWP. So MWP bought
7 Lucas Lane. What's Lucas Lane?
8 A It's one of our residence that we had
9 purchased for Ronnie and Phyllis to live in during
10 their employment.
11 Q Okay. And did you deliver that house to
12 Ronnie and Phyllis with your mother present?
13 A I believe that I went to sign it because it
14 was under the LLC, so I was able to sign that. She
15 didn't have to.
16 Q Do you recall your mother -- do you recall
17 your mother ever being at Lucas Lane?
18 A I don't believe she ever went there, no.
19 Q Okay.
20 A We might have drove past it or something,
21 but I don't -- I don't -- yeah, I don't recall.
22 Q Do you recall your mother visiting Ronnie
23 with Ronnie and Phyllis at her house?
24 A They might have came. I don't know if I
25 recall the specifics, but I'm sure they did come --

Page 60

1 Q Okay.
2 A -- to her house.
3 Q On how many occasions did Ronnie and Phyllis
4 come to your mother's house when you were present?
5 A I can't really recall exactly how many.
6 Q Can you tell me your first recollection of
7 the year that Ronnie and Phyllis came to your
8 mother's house? Was it the holiday season,
9 Thanksgiving, Christmas 2018?
10 A It could have been, but I don't remember
11 exactly the time and day that they came, what times
12 those were that -- yeah, I don't -- I don't really
13 recall the dates.
14 Q Okay. Do you recall Ronnie and Phyllis
15 being at various holiday gatherings at your mother's
16 house?
17 A They could have been.
18 Q Okay. When you say could have been, does
19 that mean you recall that they were there, but you
20 can't recall the specifics?
21 A Yeah, I can't recall the specifics exactly
22 when they were at our house.
23 Q Okay. Is it fair to say that -- that you
24 and Rick and Ricky and Gloria considered Ronnie and
25 Phyllis part of the family?

Page 61

1 A Um, yeah, I -- did my mom feel that way?
2 I'm sure that we had more -- because, you know, I
3 was in the office day to day, so probably -- you
4 know, I probably felt that, but yes, they were nice
5 people. Yes, of course, yeah.
6 Q Okay. And -- and in the time period from
7 Ronnie's hire until the time when Rick is let go in
8 January of 2020, is it fair to say things were going
9 well?
10 A Um, yes.
11 Q Okay. Is it fair to say things were going
12 better than they ever had for MTS?
13 A Around that time, I believe we were doing
14 good, yes.
15 Q Okay. I know you were doing well, but my
16 question is a little more refined. Is it fair to
17 say that in 2019 and 2020 and 2021 that MTS was
18 going better -- doing better than it ever had?
19 A We were doing good, yes. Yes, we were doing
20 good. Like I said, I didn't -- I couldn't tell you
21 about financials. I wasn't part of that. Like I
22 really -- I feel like yes, we were doing good, we
23 were doing good.
24 Q In other words, fair to say that the family
25 was -- was receiving distributions, your mother,

Page 62

1 from the company in millions of dollars per year;
2 correct?
3 A Like I said, I'm not sure about all that.
4 Like, I'm not -- yeah, I don't know. I wouldn't say
5 that we were getting millions. I wouldn't say that.
6 You know, it costs a lot to run a business, so I
7 wouldn't say that she was getting millions of
8 dollars, no.
9 Q Okay. Do you have a recollection about what
10 the finances were in 2019 and 2020?
11 A To be honest, you know, I'd say no. I know
12 that we were paying our bills, we were, you know,
13 okay. But to tell you the financial situation, I
14 couldn't tell you the dollar amount. I wasn't
15 involved in that. We have, like I said, people that
16 took care of that for us.
17 Q Let me show you Exhibit 2.
18 (Whereupon Exhibit 2 was marked for
19 identification.)
20 Q Can you see Exhibit 2 on your screen?
21 A Yes.
22 Q Okay. So Exhibit 2 on your screen, this is
23 a -- let's see. I think it's a six-page document.
24 Unfortunately, I didn't -- I didn't -- I didn't -- I
25 didn't paginate it.

Page 63

1 It says right here we need to generate 6.5 M
2 per month to break even. Do you see that?
3 A Yes.
4 Q And -- and does that refresh your
5 recollection that in 2018, 2017 by -- by this list
6 here that -- in 2017 that you needed 6.5 million of
7 receipts per month to break even?
8 A Well, me seeing this right now is showing
9 me, but like I said, I didn't take care of our
10 finances back then. But you showing me now, I can
11 can see that that's how much we needed.
12 Q Okay. But I -- it would be unfair for me to
13 ask you to tell me about it right now. Do you have
14 a recollection of knowing that back in April 2018?
15 A I don't.
16 Q Okay.
17 A I don't.
18 Q Here's another report for 2018. And you'll
19 see here that at the bottom here, it talks about
20 January through May of 2018 and talks about total
21 revenues of \$25,839,000 versus expense monthly rents
22 of \$28,727,000.
23 Does that refresh your recollection of how
24 the company was doing in April of 20 -- as of
25 May 2018?

Page 64

1 A Like I said, no, it doesn't. I don't recall
2 this. I -- I couldn't tell you anything about our
3 finances back then. I really don't recall. I
4 didn't -- like I said, I don't -- I don't know how
5 to read these. I -- I don't know. Sorry.
6 Q You don't know how to read these?
7 A Yeah, I don't. We had CPAs and accountants.
8 Q Okay. So this one shows that as of April of
9 20 -- April 30th of 2018, the company had lost,
10 according to this record, \$4,480,000. Do you see
11 that?
12 A Yes.
13 Q Okay. Now, so assuming that's the case, do
14 you recall discussing bringing in -- the need to
15 bring in Ronnie because the company was doing
16 poorly?
17 A I don't remember that's the reason why we
18 brought him in, like I said.
19 Q Okay. Do you recall -- after Rick was
20 fired, do you recall a conversation where you were
21 on the phone with Ronnie and you handed the phone to
22 your mother?
23 A You could remind me of what was said. I
24 mean, I don't --
25 Q I'll do my best. Do you recall Gloria

Page 65

1 saying to Ronnie that he had to promise her he would
2 never leave Mowbray's?
3 A Um, she -- she might have said that, yes.
4 Q Okay. All right. Well, you were in her
5 presence and could hear it -- hear what she was
6 saying, could you not?
7 A I could, sir, but you're talking about --
8 I'm so sorry -- years ago. This was -- you said it
9 was 2019?
10 Q No, no. I'll be precise. I'll refine the
11 question for you. This is -- placing this, this is
12 after Rick Mowbray is discharged. And I believe
13 that was -- I'll tell you from the records I've
14 looked at -- and you may have a different
15 recollection -- is January 23rd, 2020. But it's
16 January 2020.
17 This is a conversation that occurs between
18 yourself and Ronnie after Rick is discharged and
19 your mother gets on the phone with Ronnie and --
20 because there's, apparently, something going on
21 about Rick wants to come back and people don't want
22 him to come back and Ronnie offers to leave.
23 Do you recall that?
24 A You know what? I do not recall that. I do
25 not recall that Rick wanted to come back. I'm so

Page 66

1 sorry. Yeah, I do not recall that.

2 Q Okay. Do you recall hearing Gloria say to

3 Ronnie in a phone conversation where you hand your

4 phone to -- you're on the phone with Ronnie and you

5 hand the phone to Gloria where she wants to

6 emphasize to Ronnie that -- and says to him you must

7 promise me that you'll never leave Mowbray's.

8 A That -- that could have -- that could have

9 happened, yes, but I don't recall that. But I'm

10 sure that -- I could see, yeah, that she said that.

11 Q Why do you say you could see she could say

12 that?

13 A Because, you know, his -- you know, they --

14 just say that, you know, they were nice people and

15 that -- that she could say that. You know, I mean,

16 I think that -- yeah, Rick's rants, she probably

17 felt bad about that, you know. I could see that she

18 said that, but I really don't recall the specifics

19 of her saying that. I don't recall that.

20 Q You said something -- something about she

21 might have said something, and I didn't catch the

22 full response, something that she said. Can you

23 repeat that?

24 A Just like I said, she might have felt bad

25 for the rants that, you know, he would text Ronnie,

Page 67

1 you know, and I feel that, you know, she probably

2 just felt bad about that.

3 Q Okay. So in other words, Rick's long text

4 messages to shall we say quite a few folks --

5 A Yes.

6 Q -- and -- and your mother was on those text

7 messages, as well, wasn't she.

8 A She probably was, but I doubt that she read

9 them. He would send hundreds and hundreds, so I'm

10 sure she was.

11 Q Okay. All right. I've seen some. Yes.

12 Okay. So let me show you another document. I'm

13 going to -- this is -- let me share screen. I'm

14 going to mark this as exhibit --

15 THE REPORTER: I'm sorry. Eight?

16 MR. CATANZARITE: H. H. We're going to

17 have some letters and some numbers. I'm not trying

18 to confuse everyone, but some of these are documents

19 that were produced by your lawyers, so I'm going to

20 keep the same labeling for convenience purposes.

21 (Whereupon Exhibit H was marked for

22 identification.)

23 BY MR. CATANZARITE:

24 Q Do you -- did you have -- do you recall

25 having looked at the document production from MTS?

Page 68

1 Let me see if I can -- I'm trying to make it

2 smaller.

3 Do you -- do you recall receiving or

4 reviewing documents that were produced by -- by MTS

5 recently as part of this case, balance sheets for

6 MTS as of December 31st, 2018?

7 A You know, sir, I was given, like, 1200

8 documents. And I probably did see this, but like I

9 said, I'm so bad at math that I really didn't look

10 at these. I'm sorry.

11 Q Let me -- let's just look at this document

12 which is the profit and loss for January through

13 December 2018. It shows a gross -- it says total

14 income of \$92,621. Do you see that?

15 A Yes.

16 Q Okay. And it shows a profit of -- net

17 ordinary income, it says net ordinary income here is

18 \$1,684,000. Do you see that?

19 A Yes.

20 Q All right. So in 2018 after Ronnie is

21 brought on board, there's a net income from

22 operations of roughly \$1.684 million. Do you see

23 that?

24 A Yes.

25 Q Do you recall we earlier looked at a

Page 69

1 document that showed as of April of 2018 that the

2 period -- that the company had lost \$4,480,000

3 through the first four months; correct?

4 A Yes.

5 Q All right. So in -- in the sense, bringing

6 Ronnie on board is pretty darn good for the company

7 for Mowbray's so far; correct?

8 A Um, yeah. Yes.

9 Q Now I'm going to go to December 31st, 2019.

10 And to put this in perspective, Rick is fired right

11 after this year concludes. He's fired in January of

12 2020.

13 Do you recall how much total revenue and

14 profits Mowbray's had in January -- from 2019?

15 A No, I don't.

16 Q Okay. I'm going to show you that in --

17 well, I'll first show you the total revenue. So in

18 January to December 2019, total income was

19 \$214,828,924. Do you see that?

20 A Yes.

21 Q Okay. So double what 2018 was; correct?

22 A Uh-huh, yes.

23 Q And the profits from operations were -- net

24 ordinary income was \$13,748,498; correct?

25 A Yes.

Page 70

1 Q Okay. Now, if we look at what the
2 distributions were -- and that's on page --
3 MR. CATANZARITE: Forgive me, Kieu. I
4 should have said. That's on page TOMTS -- MTS 3231
5 is the page with the profits on it, net ordinary
6 income \$13,748,000. Revenue is shown on page 3230.
7 BY MR. CATANZARITE:
8 Q And I want to show you something right here.
9 This is distributions. So total distributions,
10 according to this, distributions were \$4,000,250
11 [sic] --
12 A Uh-huh.
13 Q -- to your mother. Do you see that?
14 A I don't think that was to my mother. I'm
15 not a CPA, but I'm sure that was definitely not in
16 her bank account. So like I said, I'm not a CPA.
17 Single corp, there's a lot of distributions. I
18 don't understand it, but yeah, I see that.
19 Q Okay.
20 A But I'll tell you that was not in her bank
21 account.
22 Q Well, how much was in her bank account that
23 you recall?
24 A There was no \$4 million. I'll tell you
25 that.

Page 71

1 Q How many millions was it?
2 A No millions. It was no millions. I could
3 tell you that.
4 Q How can you say that?
5 A Because I know. Because I could. I could
6 tell you that. Well, I couldn't tell you exactly,
7 but I -- (unintelligible)
8 THE REPORTER: I'm sorry. You cut out at
9 the end there.
10 THE WITNESS: Like I said, I'm not a CPA,
11 but that wasn't -- there's taxes. It goes back to
12 the business. Like I said, I'm not a CPA. And this
13 is -- I'm not sure about -- this is my mother's. I
14 don't know where -- where -- what we're trying to
15 get at.
16 BY MR. CATANZARITE:
17 Q Well, we were talking about distributions
18 earlier.
19 A Right, and you said that this was given to
20 my mother. Like I said, I'm not a CPA, and I don't
21 think that this was a check given for \$4 million to
22 my mother. You'd have to talk to our CPA about
23 that. You'd have to depose him, but yeah.
24 Q Okay. Well, there's another account that
25 says distribution that says \$2,767,478. Do you see

Page 72

1 that?
2 A Yes.
3 Q I mean, you understand that distributions
4 are transfers from the company to the shareholder;
5 correct?
6 A But it's -- it's more that goes into that.
7 It's -- yeah, it's just -- there's a lot that goes
8 into it. Like I said, I'm not a CPA. You'd have to
9 talk to him about that. It's not like it's a check
10 given to my mom. There's other assets, like I said.
11 Q But you would agree with me that according
12 to this, the distributions were \$7 million; correct?
13 A That -- yeah, I -- I guess so.
14 Q Okay. Now, let's go to 2020. In 2020, do
15 you recall -- now, 2020 is the year in which Rick is
16 discharged the end of January, Ronnie continues in
17 his role, and sometime during the year, he's asked
18 to step down; correct?
19 A Yes.
20 Q Do you recall what type of year 2020 was?
21 A I don't recall the exact time, no.
22 Q Was it, again, double what 2019 had been?
23 A I don't recall.
24 Q You recall 2019 was \$220 million; correct?
25 A Right. What you showed me, yes.

Page 73

1 Q And 2019 -- 2018, it was \$92 million;
2 correct?
3 A I guess that's what you're showing me, yes.
4 Q And then if we go to 2020 -- in 2020 on page
5 3234 of Exhibit H, the revenue total income is
6 \$470,525,295; correct?
7 A Yes.
8 Q It's double 2019 which was 220,000 which
9 doubled 2018 which was 90 -- 92 -- I'm sorry. Did I
10 say -- I'm going to rephrase the question. My
11 apologies, Robin.
12 Anyway, \$470 million is double 2020 which
13 was -- \$470 million -- I'll restart. New question.
14 \$470 million in 2020 was more than double 2019 which
15 was \$220 million; correct?
16 A Yes.
17 Q And 2019 was double the \$92 million in 2018;
18 correct?
19 A Yes.
20 Q And the profits -- let's look at the
21 profits. The profits in 2020, the net operating
22 income, which appears on page 3235 was \$69,630,755;
23 correct?
24 A That's what it looks like, yes.
25 Q Okay. And -- and if we go back and look at

Page 74

1 our distributions which appears on page 3233, the
2 distributions were -- says \$3,453,623 to Gloria tax
3 and another \$3,593,978 to Robin tax.
4 A Yes.
5 Q Okay. Can you tell me, if you know, were
6 you a shareholder as of 2020?
7 A I wasn't a shareholder. I think I just --
8 they had -- I think I had a percentage of the
9 company, but I don't think I was a shareholder. I
10 think I just had a percentage, but I don't believe I
11 was a shareholder. But I'm -- I don't think I was.
12 Q Well, according to this, if I add up the two
13 Gloria tax and Robin tax distributions and divide it
14 by -- divide it by the distribution you received,
15 you would be a 51 percent shareholder.
16 Do you recall being a 51 percent shareholder
17 in 2020?
18 A I don't think a shareholder is different
19 from the percentage of the company. Yeah, I
20 don't -- but -- I don't -- I don't -- you have to
21 ask our corporate attorney. I don't think that's --
22 I don't understand all that, but -- but yeah.
23 Like I said, you have to talk to our CPA how
24 this is all distributed, the S corp and all that,
25 because distributions is not like I think I got a

Page 75

1 check for this. It probably went back to the
2 company. I mean, I don't -- you have to, like I
3 said, talk to our CPA.
4 Q Okay. Let's talk about the move into the
5 office -- the new office. Where's the new office
6 located?
7 A It's in San Bernardino.
8 Q What street is it on?
9 A It's on Mill Street.
10 Q Okay. And where -- where was it before it
11 moved to Mill Street?
12 A It was on Business Center Drive in San
13 Bernardino.
14 Q Okay. Now, do you recall when that office
15 opened formally?
16 A Like I said, I'm so bad with years and
17 dates. I think -- what did we say it was, 2020?
18 Q Okay. Do you recall if Ronnie was asked to
19 step down before the office opened?
20 A I don't recall. I'm thinking that maybe he
21 was there, but then COVID was around that time where
22 they're working from home. I don't --
23 Q Okay. Well, I want to orient you a little
24 bit. I won't mislead you, I promise. COVID started
25 in March of 2020; correct?

Page 76

1 A I think so.
2 Q Okay. So in -- if I tell you that Ronnie
3 was asked to step down in October 2020, does that
4 reconcile with what your recall is?
5 A I thought they were at the office, but like
6 I said, I don't recall.
7 Q Let's look at the -- let's see. This is
8 Exhibit I which is Ronnie's employment agreement.
9 Hang on a second. I want to make sure this is the
10 right one with the date on it. Yeah. Okay. This
11 is -- I'm going to show you Exhibit I.
12 (Whereupon Exhibit I was marked for
13 identification.)
14 Q I'm going to put it on the screen for you.
15 Can you see Exhibit I on the screen now?
16 A Yes.
17 Q All right. So this is an employment
18 agreement. It says it's entered into as of
19 January 1, 2020. Did you ever read this document?
20 A To be honest, I really didn't.
21 Q Okay. And so I want to go to the end of
22 this document and -- because there's some signature
23 line here. You see that this is -- this appears to
24 be signed by Ronnie on -- after paragraph 29, and
25 then we have -- can you make out that signature that

Page 77

1 appears on --
2 A Yeah, that's my signature. Like I said, I
3 probably went over it with my lawyers. But like I
4 said, my lawyers prepared this and --
5 Q Well, don't tell me anything your lawyers
6 said. I'm just looking for the timing. So if I go
7 back to this, it's -- there's an SC, Stephen. Is
8 that Stephen Cho? Do you know?
9 A Yes.
10 Q Okay. And it says Wednesday, September 16th
11 at 6:56 p.m. Does that refresh your recollection of
12 when your signed page was sent over to Ronnie?
13 A I guess this is showing that it's around
14 that time.
15 Q Okay. And I'm going to go show you another
16 document. I want to show you Exhibit I. This is
17 Exhibit I. Can you see that on the screen?
18 A Yes.
19 THE REPORTER: Counsel, you have two Exhibit
20 I's.
21 MR. CATANZARITE: That wouldn't be very
22 good, would it? I have two Exhibit I's? Oh, I'm
23 sorry. I may have -- I may have mislabeled that.
24 Hold on a second. Exhibit I was the employment
25 agreement.

Page 78

1 This, I will relabel to be -- I'm going to
2 relabel this to be Exhibit 7. I'm going to first
3 close this and reopen it.
4 (Whereupon Exhibit 7 was marked for
5 identification.)
6 BY MR. CATANZARITE:
7 Q Do you see Exhibit 7 now?
8 A Yes.
9 Q Okay. Exhibit 7 is -- I'll identify as a
10 Robin Mowbray e-mail to Ronnie Jordan, Phyllis
11 Jordan, and Richard Mowbray dated 4/24/20. Do you
12 see that?
13 A Yes.
14 Q Okay. So this -- this document describes an
15 earlier e-mail or a later e-mail from Alan Phaing,
16 and we'll get -- we'll come to that. But this
17 document says on 4/15/20 that -- 4/24/20 that
18 certain things were changed in an employment
19 agreement.
20 Do you see that?
21 A Yes.
22 Q Okay. Do you recall what was changed?
23 A Um, at this -- I didn't -- I guess it's
24 saying that had to make some changes. The contract
25 does count. The future, including increases and

Page 79

1 premiums -- future, yeah, PG&E work -- so this is
2 Rick -- yeah, this is -- I don't recall, but this is
3 refreshing my memory.
4 Q What was the status of PG&E at that time?
5 A Um, I don't recall. I remember that work
6 was slow. I don't know exactly what was going on,
7 but I think --
8 Q Okay. Did they file bankruptcy in January
9 of 2020 --
10 A Yes.
11 Q -- if you know?
12 A Yes.
13 Q Okay. So there was a problem with PG&E
14 because --
15 A That's right. Yes.
16 Q All right. So -- so the concern is -- part
17 of the concern for having this contract was what was
18 going on with PG&E; is that correct?
19 A Yes.
20 Q Okay. In other words -- I put it back on
21 the screen -- was there a concern that there would
22 be a downturn in PG&E work and that you might not
23 get paid?
24 A Yes.
25 Q However, if we look at -- if we look at the

Page 80

1 financials for 2020, PG&E work doesn't seem to
2 have -- the problem with PG&E doesn't seem to have
3 hurt the \$470 million of revenue; correct?
4 A I don't recall. I don't know if we were
5 getting payments. I don't -- I don't -- like I
6 said, I don't know how to read these. I'm not an
7 accountant or CPA.
8 Q Okay. If we look at exhibit -- again,
9 Exhibit I which is the financial statements -- or
10 Exhibit H which is the financial statements, the
11 revenue in 2019, the net income was \$13,748,000;
12 correct?
13 A That's what it appears to be, yes.
14 Q Okay. And distributions were substantial;
15 correct? Do you recall that, \$7 million?
16 A Yeah, that's what it says.
17 Q Okay. On page 3229. How much was Ronnie,
18 if you know, expecting his ten percent would --
19 would be in 2019?
20 MR. CHO: Objection. Calls for speculation.
21 Lacks foundation. If you know, go ahead and answer.
22 THE WITNESS: I don't know. I don't know.
23 MR. CATANZARITE: I'll withdraw the
24 question. That would be speculation.
25 ///

Page 81

1 BY MR. CATANZARITE:
2 Q Did you -- did you have an understanding as
3 to what ten percent, if payable to Ronnie, would
4 have amounted to?
5 A I wasn't sure, no.
6 Q Okay. In 2020, without -- had ten percent
7 been payable to Ronnie Jordan, what would that have
8 amounted to?
9 A Are you saying ten percent of the net
10 income?
11 Q Yes.
12 A Are you asking me what ten percent of that
13 is? I guess it's \$7 million. Like I said, I'm so
14 bad at math. I don't know.
15 Q Well, I think --
16 (Simultaneously speaking. Not reportable.)
17 THE REPORTER: I didn't get that last part.
18 THE WITNESS: I couldn't tell you. Like I
19 said, I --
20 MR. CATANZARITE: Let me -- let me rephrase.
21 THE WITNESS: You want me to get a
22 calculator and put ten percent of this? I can do
23 that for you.
24 BY MR. CATANZARITE:
25 Q Well, you were right. You said about

Page 82

1 \$7 million; correct?

2 A Okay. Okay. Yes.

3 Q All right. In other words, \$69,630,755 is

4 roughly \$70 million; right?

5 A Yes.

6 Q Ten percent of \$70 million is \$7 million;

7 correct?

8 A Yeah, but I don't -- I don't know if that

9 was an agreement of the ten percent at that time.

10 Like I said, my mother was not in agreement with

11 that. So --

12 Q Right. So if we look at this agreement

13 which is Exhibit 4 --

14 A Uh-huh.

15 Q -- ten percent of -- of what purports to be

16 in this one-page document -- and I understand that

17 your mother disagreed with it and that others

18 disagreed with it. That would be -- the ten percent

19 was of the profits; correct?

20 A If you're saying ten percent of profits,

21 yeah, I guess -- yeah, I guess.

22 Q All right. Now, Ronnie had already been

23 there since May of 2018; correct?

24 A I believe so.

25 Q And the employment agreement that is offered

Page 83

1 to him is -- is effective January 1st of 2020;

2 correct?

3 A I believe so.

4 Q Okay. So Ronnie compensated for 2018 and

5 2019.

6 A I believe this isn't signed. The agreement

7 was signed -- what's the date of this?

8 Q Well, it's -- we don't have the date of when

9 Ronnie signs it, but it's signed by you and

10 transmitted by Mr. Cho to Ronnie on September 16th

11 of 2020.

12 A Okay. So I think that's when it was signed,

13 2020.

14 Q Okay. Okay. So was there any discussion

15 about, gee, we better get a different agreement

16 signed because we're going to owe Ronnie about

17 \$7 million?

18 A No.

19 Q Was there ever any discussion about we

20 better get a different agreement signed because ten

21 percent would be millions of dollars due to Ronnie

22 for '18 and '19?

23 A No.

24 Q Okay. Was that ever discussed at all what

25 ten percent of 2018 and 2019 profits would be?

Page 84

1 A Not with me, no.

2 Q Okay. So if we looked at the typed version

3 of the document, you estimated that you received

4 this document, you say, roughly six months to a year

5 before you moved into the new office; correct?

6 A Like I said, I don't recall the exact date.

7 I just remember we were at the other office, and

8 I -- I can't give you an exact date when I received

9 this.

10 Q Okay. And so Ronnie -- and if the -- if I

11 tell you the new office relocation was Jan -- was

12 October 2020, that means that you received this

13 document to be delivered to Gloria and discussed it

14 with her as you described somewhere between

15 October 2019 and roughly April 2020; correct?

16 A Could have been, yes.

17 Q Okay. And if we look at this April 2020 --

18 I want to get to this April 2020 agreement again.

19 Do you see April 2020?

20 A Yes.

21 Q That's April 24th of 2020. So is -- what I

22 want -- I want to see is if I can refine, perhaps,

23 your recollection of when you saw the May 28th

24 typewritten document, the one page.

25 Is it your recollection that the -- the

Page 85

1 May 28, 2008, Exhibit 4 was handed to you to give to

2 Gloria in April of 2020 -- approximately April about

3 six months before the office move?

4 A Like I said, I can't remember the exact

5 date. I -- I just don't know.

6 Q Okay.

7 A I don't know when it was. If it was before

8 that, I just don't know.

9 Q Yeah, the reason -- the reason I'm asking

10 these questions is because there's -- there's no

11 discussion of an employment agreement for Ronnie

12 tendered before this document that's sent sometime

13 in April 2020; is that correct?

14 A I believe so.

15 Q Okay. And -- and --

16 A I'm not certain.

17 Q And you guys know at the time, meaning you

18 and your mom and Rick -- well, Rick -- you don't

19 discuss -- I'll withdraw the question. New and

20 fresh question.

21 Is it your testimony that you have no

22 recollection of ever discussing with Rick Mowbray

23 the ten percent bonus that Ronnie is asking about in

24 his May 28, 2008, typewritten page?

25 A Yeah, I don't recall. I don't recall ever

Page 86

1 having a discussion with Rick.

2 Q Okay. And can you tell me why no one talked

3 to Rick? Why didn't you or Gloria talk to Rick

4 about this?

5 A I'm not sure if my mom talked to him about

6 this. Me personally, I don't recall talking about

7 this to Rick. My mom could have.

8 Q Okay. Got it. Okay. I want to ask you

9 about the announcement that Rick makes. This is

10 in -- Exhibit 6. I've put Exhibit 6 on the screen.

11 (Whereupon Exhibit 6 was marked for

12 identification.)

13 Q Can you see it?

14 A Yes.

15 Q All right. Now, Rick Mowbray announces to

16 all Mowbray's employees Ronnie's coming on board.

17 Do you have a recollection of this announcement?

18 A Um --

19 Q Three pages --

20 A I believe I might have looked over this --

21 this -- this weekend when I was given some of these

22 documents.

23 Q Did you review it at the time it was posted

24 to all of the employees?

25 A I might have.

Page 87

1 Q Okay. This is Bates -- plaintiff's Bates

2 page number 445 through 47.

3 A Uh-huh.

4 Q Do you have a recollection of reading this

5 beginning to end at the time Rick posted it?

6 A I might have.

7 Q Did you disagree with any of it?

8 A I don't know. I don't -- I would have to

9 read it again.

10 Q Did your -- to your knowledge, did your

11 mother, Gloria, read this posting?

12 A I'm not sure.

13 Q Okay. Can you tell me why Rick made this

14 posting?

15 A I'm not sure.

16 Q You sort of laughed as you said that.

17 A He would do a lot of -- yeah, he would do a

18 lot of posting and all that.

19 Q Okay. But, I mean, did -- did Mowbray's --

20 MTS take issue with anything that Rick said in this

21 announcement?

22 A I would have to read it right now, sir,

23 and -- and go back. At the time, I don't know. I

24 would have to read it right now.

25 Q Well, let me ask you a question -- a little

Page 88

1 bit different question. Had you -- had you realized

2 that Rick posted this when he shouldn't have, it

3 would have been withdrawn or replaced by somebody

4 else writing a correction; is that correct?

5 A I just -- I think this is pretty much

6 summoned up to announce that he's coming to work for

7 us.

8 Q Okay.

9 A I think -- nobody had an issue with Ronnie

10 coming to work with us. No, not at all.

11 Q Okay. That's what I was getting at.

12 A Yes.

13 Q So this was a favorable affirmation, so to

14 speak, or verification that Ronnie was coming to

15 work for MTS by this announcement to all of its

16 employees by Rick; correct?

17 A I don't know if anybody else -- I don't

18 recall if anybody else made an announcement, but

19 this is definitely from Rick, yes. I don't recall

20 if anybody else made an announcement, but this was,

21 yeah, made by Rick, yes.

22 Q Have -- have you -- have you ever heard the

23 term buzz -- that there was a buzz about something?

24 A Yeah, I've heard that term.

25 Q Okay. Would this -- would it be fair to say

Page 89

1 that this posting and announcement created a buzz at

2 MTS?

3 A No, I wouldn't say that, no. I don't -- I

4 don't -- a buzz, no. I think it was just saying

5 that Ronnie's going to be CEO.

6 Q Okay. Would it be fair to say that there

7 was an excitement about Ronnie coming to work for

8 MTS?

9 A From Rick, yeah, I could see definitely. I

10 think I was seeing that they had a work relationship

11 before, so he was definitely, yeah, excited about

12 it.

13 Q Well, would it be fair to say that Mowbray's

14 itself -- the company itself, yourself, Gloria,

15 Denise that there was an excitement about Ronnie

16 coming to work for MTS?

17 A Um, sure. Yes, sure.

18 Q And, in fact, that hire, the hire of Ronnie

19 Jordan, resulted in positive revenues for 2018 in

20 \$92 million; correct?

21 A I don't know if I would say that, sir. Like

22 you said, the men are out there in the field are the

23 ones that do the work, are the ones that -- we've

24 had contracts in place. We've had Edison contracts

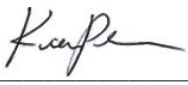
25 in place for years.

<p style="text-align: right;">Page 90</p> <p>1 But he was pay very big part of it. Yes, he</p> <p>2 knew this business, but I wouldn't say it was all</p> <p>3 contributed to that.</p> <p>4 Q Okay. And in -- in 2019, MTS does</p> <p>5 \$220 million in revenue. Do you give Ronnie Jordan</p> <p>6 any credit for that?</p> <p>7 A Yes, I would give some credit, yes, but I</p> <p>8 would say there was other attributes, too, also.</p> <p>9 Q And in 2020 with Ronnie working through and</p> <p>10 not, quote, stepping down until October of 2020,</p> <p>11 there's \$470 million of revenue. Do you give him</p> <p>12 any credit for that?</p> <p>13 A I would say a lot of people had contributed</p> <p>14 to that, yes.</p> <p>15 Q Okay. And I'm not saying, nor do we imply</p> <p>16 by my questions that Ronnie was the only one doing</p> <p>17 anything. I'm talking about an executive who's a</p> <p>18 leader and who galvanizes the team and who has</p> <p>19 connections with utility companies and takes</p> <p>20 Mowbray's to a doubling of revenue from '18 to '19</p> <p>21 and '19 to '20.</p> <p>22 Is there not excitement about that?</p> <p>23 A I wouldn't say all that, but it was -- like</p> <p>24 I said, I wouldn't -- I wouldn't recall that.</p> <p>25 Q And then what happens after he steps down?</p>	<p style="text-align: right;">Page 92</p> <p>1 second, please. I'm not hearing you clearly. If</p> <p>2 you can slow down and repeat your answer.</p> <p>3 THE WITNESS: If you're saying what happened</p> <p>4 to 2021, there was a bad accident that happened that</p> <p>5 really affected us, Mowbray's. There's a lot of</p> <p>6 things that happened between that time.</p> <p>7 BY MR. CATANZARITE:</p> <p>8 Q But is it fair to say --</p> <p>9 A So we had to pay more money for insurances.</p> <p>10 There was a lot of different things that happened in</p> <p>11 this -- in this type of business.</p> <p>12 Q Can you tell me by range or estimate what</p> <p>13 the revenue was in 2021?</p> <p>14 A No, I couldn't tell you.</p> <p>15 Q Okay. Can you tell by range or estimate</p> <p>16 what the revenue was in 2022?</p> <p>17 A No, I couldn't tell you -- (unintelligible)</p> <p>18 Q Okay.</p> <p>19 THE REPORTER: I'm sorry. One second. I</p> <p>20 didn't get the last part of the answer.</p> <p>21 THE WITNESS: I couldn't tell you offhand.</p> <p>22 No, I couldn't tell you this, no.</p> <p>23 MR. CATANZARITE: Okay.</p> <p>24 BY MR. CATANZARITE:</p> <p>25 Q Well, let me show you. Let me see if it</p>
<p style="text-align: right;">Page 91</p> <p>1 A What do you mean by that?</p> <p>2 Q What happens to that \$470 million revenue</p> <p>3 achieved at 2020? What happens in 2021?</p> <p>4 A I'm not sure what -- I'm not sure -- like I</p> <p>5 said, I'm not -- the financials, what are you</p> <p>6 referring to?</p> <p>7 Q Okay. So we doubled from '18 to '19 \$92</p> <p>8 million to \$220 million. True so far?</p> <p>9 A Yeah, well, we didn't get a lot of -- we</p> <p>10 didn't get a lot of area in PG&E. There's a lot of</p> <p>11 things that contributed to that. We got -- the Bay</p> <p>12 Area was just the worst.</p> <p>13 There was a lot of -- a lot of things that</p> <p>14 happened between that time. But like I said,</p> <p>15 financials, you have to talk to Alan Phaing. He was</p> <p>16 our accountant. A lot of things that contribute to,</p> <p>17 you know --</p> <p>18 Q You're not --</p> <p>19 (Simultaneously speaking. Not reportable.)</p> <p>20 THE REPORTER: Sorry. One second. You're</p> <p>21 talking at the same time.</p> <p>22 THE WITNESS: We had a -- we had a very bad</p> <p>23 accident in Edison where they -- (unintelligible)</p> <p>24 THE REPORTER: I'm sorry. I didn't hear.</p> <p>25 I'm sorry. Ms. Mowbray, if you can give me a</p>	<p style="text-align: right;">Page 93</p> <p>1 helps you. Do you see -- let me go to 2021. Let's</p> <p>2 go to 2021. Okay. 2021 revenue was -- do you see</p> <p>3 it says total sales on this page \$284,079?</p> <p>4 A Yes.</p> <p>5 Q I'm sorry. I miss -- misspoke. I'll</p> <p>6 rephrase the question. Do you see the total sales</p> <p>7 were \$284,079,290?</p> <p>8 A Yes.</p> <p>9 Q And that's on page 3238. And on page 323 --</p> <p>10 3240, income was \$31 million -- \$31,052,850. Do you</p> <p>11 see that?</p> <p>12 A Yes, I see that.</p> <p>13 Q Okay. So revenue declined and profits</p> <p>14 declined; correct?</p> <p>15 A Yes.</p> <p>16 Q And in 2022, you lost money; correct?</p> <p>17 A Yes.</p> <p>18 Q Okay. So -- and are you going to attribute</p> <p>19 that to happenstance in the business and unfortunate</p> <p>20 injury?</p> <p>21 A Yes.</p> <p>22 Q In other words, you're not going to</p> <p>23 attribute it to the change in management.</p> <p>24 A No.</p> <p>25 Q So Ricky who was how old in January of 2021?</p>



<p style="text-align: right;">Page 94</p> <p>1 A I'm not sure. What does that have to do</p> <p>2 anything? An age? Maybe 35.</p> <p>3 Q Okay.</p> <p>4 A 34.</p> <p>5 Q And so Ricky takes over in the end of 2020,</p> <p>6 a \$470 million year that Mr. Jordan had led, and</p> <p>7 immediately, the decline is material; correct?</p> <p>8 A There's a lot of attributes that happened</p> <p>9 around that time, sir.</p> <p>10 Q And then in 2022, there's a massive loss;</p> <p>11 correct?</p> <p>12 A Yes.</p> <p>13 Q Okay. And he -- he, Ricky, is not to blame</p> <p>14 for any of that decline and loss?</p> <p>15 A No blame at all.</p> <p>16 Q Okay. You as a shareholder, you're happy</p> <p>17 with that result?</p> <p>18 A Well, sir, like I said, this business is</p> <p>19 very hard. We've had accidents, we've had deaths,</p> <p>20 and we've had a loss in -- we didn't get a lot of</p> <p>21 areas. And PG&E, we had the Bay Area. There's a</p> <p>22 lot of attributes.</p> <p>23 So I'd say, yeah, there's a lot that goes</p> <p>24 into this business, and it's just not one person</p> <p>25 that contributes to making it or breaking it.</p>	<p style="text-align: right;">Page 96</p> <p>1 makes relevancy objections or will tell you not</p> <p>2 to -- not to answer a question. This is a</p> <p>3 deposition, so I'm entitled to ask you.</p> <p>4 And I'm going to show you Pino Tree Service</p> <p>5 the -- this is a Secretary of State filing for Pino</p> <p>6 Tree Service marked as Exhibit 8 filed 9/7/22.</p> <p>7 (Whereupon Exhibit 8 was marked for</p> <p>8 identification.)</p> <p>9 Q Type of business, tree service. Jacobus De</p> <p>10 Pino is the chief executive, you are the secretary,</p> <p>11 and Phaing is the CFO?</p> <p>12 Do you see that?</p> <p>13 A Yes.</p> <p>14 Q And you're the owner; correct?</p> <p>15 A Yeah. They're a very small company. So</p> <p>16 like I said, I don't see how this is relevant to</p> <p>17 anything that we're talking about, but -- I guess</p> <p>18 you have it right there.</p> <p>19 Q Okay. And I'm going to show you Exhibit 9.</p> <p>20 (Whereupon Exhibit 9 was marked for</p> <p>21 identification.)</p> <p>22 Q This shows Robin Mowbray as the director --</p> <p>23 sole director. Do you see that?</p> <p>24 A I do see that. Like I said, I don't know</p> <p>25 how this is relevant, but I see that, yes.</p>
<p style="text-align: right;">Page 95</p> <p>1 Q Okay. Are you still in business today?</p> <p>2 A Yes.</p> <p>3 Q Okay. Are you in business through Pino Tree</p> <p>4 Service?</p> <p>5 A No.</p> <p>6 Q Do you own Pino Tree Service?</p> <p>7 A I don't think that's -- what is that</p> <p>8 relevant to what this case is? They're a</p> <p>9 subcontractor of ours.</p> <p>10 Q Okay. But my question's a little bit</p> <p>11 different. Do you -- does Robin Mowbray own Pino</p> <p>12 Tree Service?</p> <p>13 A I don't see what that has to do with this at</p> <p>14 all.</p> <p>15 Q Are you unable to answer the question,</p> <p>16 Ms. Mowbray?</p> <p>17 A Yes, I am. I don't feel comfortable in</p> <p>18 answering that question. Yes, I don't feel</p> <p>19 comfortable.</p> <p>20 Q What makes you uncomfortable about that</p> <p>21 question?</p> <p>22 A Because I think it's irrelevant.</p> <p>23 Q Other than that --</p> <p>24 A It's irrelevant.</p> <p>25 Q Okay. But you're -- you see, your lawyer</p>	<p style="text-align: right;">Page 97</p> <p>1 Q Well, my question -- my next question to you</p> <p>2 is, Ms. Mowbray, are -- are you moving the business</p> <p>3 of MTS into Pino because of adverse financial</p> <p>4 consequences at MTS?</p> <p>5 A No, sir. No, sir.</p> <p>6 Q Can you tell me why you became the owner and</p> <p>7 acquired Pino Tree Service?</p> <p>8 A I think it's just our agreement that we have</p> <p>9 Pino. He was having financial difficulties, and I</p> <p>10 think you just need to ask him those questions,</p> <p>11 really.</p> <p>12 Q Okay. How much did you pay Pino for this</p> <p>13 stock?</p> <p>14 A I'm not sure.</p> <p>15 Q Give me a range or estimate, please.</p> <p>16 A I don't have it. I'm not -- I think it's</p> <p>17 still in negotiations, so I'm not aware. You'd have</p> <p>18 to ask our financial or accountant. You can ask</p> <p>19 Alan.</p> <p>20 Q Okay. So you can't tell me whether you paid</p> <p>21 a dollar or a million dollars.</p> <p>22 A No, I couldn't.</p> <p>23 Q Okay.</p> <p>24 MR. CHO: It's been about an hour, Ken.</p> <p>25 When you think it's appropriate, I'd like another</p>



<p style="text-align: right;">Page 98</p> <p>1 ten-minute break.</p> <p>2 MR. CATANZARITE: That will be good. Let's</p> <p>3 do -- come back at 11:31.</p> <p>4 MR. CHO: Sounds good.</p> <p>5 MR. CATANZARITE: Thank you.</p> <p>6 THE VIDEOGRAPHER: Going off the record at</p> <p>7 11:22 a.m.</p> <p>8 (Whereupon a short break was taken</p> <p>9 from the proceedings.)</p> <p>10 THE VIDEOGRAPHER: The time is 11:40 a.m.</p> <p>11 We're back on the video record.</p> <p>12 MR. CATANZARITE: So, Robin, you were -- you</p> <p>13 asked me something before we went back on the</p> <p>14 record. Would you state it for the record, please.</p> <p>15 THE WITNESS: Yes, please. I'm so sorry.</p> <p>16 I've been sick this whole weekend, and I just -- I</p> <p>17 feel nauseous. I can't concentrate. I just want to</p> <p>18 be able to give you my best testimony. If we could</p> <p>19 reschedule.</p> <p>20 MR. CATANZARITE: And thank you for that,</p> <p>21 Robin. We hope you get well.</p> <p>22 THE WITNESS: Thank you.</p> <p>23 MR. CATANZARITE: Your lawyer Stephen and I</p> <p>24 discussed at the break that we would trail you after</p> <p>25 Ricky's deposition --</p>	<p style="text-align: right;">Page 100</p> <p>1 there so that they know where we begin; all right?</p> <p>2 THE WITNESS: Thank you so much. Thank you.</p> <p>3 MR. CATANZARITE: You're welcome. Thank</p> <p>4 you. All right. Thank you, Elizabeth.</p> <p>5 MR. CHO: I just need the transcript. I</p> <p>6 will not need the video.</p> <p>7 THE VIDEOGRAPHER: Thank you. Sorry. This</p> <p>8 concludes the deposition of Robin Mowbray. Going</p> <p>9 off the record at 11:42 a.m.</p> <p>10 (Deposition proceeding concluded at 11:42 a.m.)</p> <p>11 -o0o-</p>
<p style="text-align: right;">Page 99</p> <p>1 THE WITNESS: Sure.</p> <p>2 MR. CATANZARITE: -- which is set for</p> <p>3 June 7th beginning at 9:00 a.m. We'll do it by</p> <p>4 video again, and you could stand by and go back on 2</p> <p>5 to 3 o'clock.</p> <p>6 THE WITNESS: Sure.</p> <p>7 MR. CATANZARITE: And we'll try to stay</p> <p>8 late. Kieu, will you be doing that depo?</p> <p>9 THE REPORTER: No. I will be out of town,</p> <p>10 actually.</p> <p>11 MR. CATANZARITE: Okay. So we'll ask --</p> <p>12 we'll ask the court reporter if they can give us</p> <p>13 someone who can stay late. We don't want them to</p> <p>14 have to run out at 5:00, if that's okay.</p> <p>15 Stephen, is that okay with you -- I know you</p> <p>16 have young children -- to stay late?</p> <p>17 MR. CHO: Yes.</p> <p>18 MR. CATANZARITE: Will that work for you?</p> <p>19 MR. CHO: It works on that day.</p> <p>20 MR. CATANZARITE: Okay. All right. Okay.</p> <p>21 So with that, we're going to conclude the record as</p> <p>22 it is so far. This will be part one, and we'll</p> <p>23 reconvene part two on the 7th.</p> <p>24 And, Kieu, if you could give the page</p> <p>25 number -- the last page number to your bosses over</p>	<p style="text-align: right;">Page 101</p> <p>1 REPORTER'S CERTIFICATION</p> <p>2</p> <p>3 I, KIEU PHAM, a Certified Shorthand</p> <p>4 Reporter, in and for the State of California, do</p> <p>5 hereby certify:</p> <p>6 That the foregoing witness was by me duly</p> <p>7 sworn; that the deposition was then taken before me</p> <p>8 at the time and place herein set forth; that the</p> <p>9 testimony and proceedings were reported</p> <p>10 stenographically by me and later transcribed into</p> <p>11 typewriting under my direction; that the foregoing</p> <p>12 is a true record of the testimony and proceedings</p> <p>13 taken at that time.</p> <p>14</p> <p>15</p> <p>16 IN WITNESS WHEREOF, I have subscribed my</p> <p>17 name this 13th day of June, 2023.</p> <p>18</p> <p>19 </p> <p>20</p> <p>21</p> <p>22 Kieu Pham, CSR NO. 13667</p> <p>23 (The foregoing certification of this transcript does</p> <p>24 not apply to any reproduction of the same by any</p> <p>25 means, unless under the direct control and/or</p> <p>supervision of the certifying reporter.)</p>

Page 102

1 DECLARATION UNDER PENALTY OF PERJURY

2

3 Assignment No. 445868

4 Case Caption: Jordan v. The Original Mowbray's Tree

5 Service, Inc., et al.

6

7 I declare under penalty of perjury that I

8 have read the entire transcript of my Deposition

9 taken in the above captioned matter or the same has

10 been read to me, and the same is true and accurate,

11 save and except for changes and/or corrections, if

12 any, as indicated by me on the DEPOSITION ERRATA

13 SHEET hereof, with the understanding that I offer

14 these changes as if still under oath.

15 Signed on the _____ day of _____,

16 20____.

17

18 _____

19 ROBIN MOWBRAY

20

21

22

23

24

25

Page 103

1 DEPOSITION ERRATA SHEET

2 Page No._____ Line No._____ Change to:_____

3 _____

4 Reason for change: _____

5 Page No._____ Line No._____ Change to:_____

6 _____

7 Reason for change: _____

8 Page No._____ Line No._____ Change to:_____

9 _____

10 Reason for change: _____

11 Page No._____ Line No._____ Change to:_____

12 _____

13 Reason for change: _____

14 Page No._____ Line No._____ Change to:_____

15 _____

16 Reason for change: _____

17 Page No._____ Line No._____ Change to:_____

18 _____

19 Reason for change: _____

20 Page No._____ Line No._____ Change to:_____

21 _____

22 Reason for change: _____

23 _____

24 SIGNATURE: _____ DATE _____

25 ROBIN MOWBRAY



\$	\$4,000,250 70:10	10:20 57:10
\$1,684,000 68:18	\$4,480,000 64:10 69:2	10:24 57:17
\$1.684 68:22	\$470 73:12,13,14 80:3 90:11 91:2 94:6	11:22 98:7
\$13,748,000 70:6 80:11	\$470,525,295 73:6	11:31 98:3
\$13,748,498 69:24	\$6 33:18	11:40 98:10
\$2,767,478 71:25	\$69,630,755 73:22 82:3	11:42 100:9,10
\$214,828,924 69:19	\$7 72:12 80:15 81:13 82:1,6 83:17	12/31/2017 30:17
\$220 72:24 73:15 90:5 91:8	\$70 82:4,6	1200 68:7
\$25,839,000 63:21	\$92 73:1,17 89:20 91:7	16th 77:10 83:10
\$28,727,000 63:22	\$92,621 68:14	18 83:22 90:20 91:7
\$284,079 93:3	-	19 83:22 90:20,21 91:7
\$284,079,290 93:7	-o0o- 100:11	1974 11:3
\$3,453,623 74:2	1	1992 8:4
\$3,593,978 74:3	1 76:19	1993 8:11 15:3 46:12
\$31 93:10	100 13:5 14:7,9	1st 12:3,21 15:7 83:1
\$31,052,850 93:10	10:09 57:13	2 62:17,18,20,22 99:4
\$4 70:24 71:21		

20 43:8 63:24 64:9 90:21	69:12 72:14,15,20 73:4, 12,14,21 74:6,17 75:17, 25 76:3,19 79:9 80:1 81:6 83:1,11,13 84:12, 15,17,18,19,21 85:2,13 90:9,10 91:3 94:5	3229 80:17
2000 19:7	2021 12:3,21 15:8 61:17 91:3 92:4,13 93:1,2,25	323 93:9
2002 11:23 15:20,23 29:14	2022 92:16 93:16 94:10	3230 70:6
2007 17:22 18:15	2023 4:2,12	3231 70:4
2008 17:22 85:1,24	220,000 73:8	3233 74:1
2010 18:23	23rd 65:15	3234 73:5
2011 18:1	24th 84:21	3235 73:22
2013 19:7,9,14 20:19	28 42:15 48:16 85:1,24	3238 93:9
2017 32:17,25 63:5,6	28th 43:25 84:23	3240 93:10
2018 16:11,12 23:16 24:11,14 25:8 26:6,9,13,17,23,25 27:23 28:25 29:6,9,15 30:11,13,20,25 31:6,17 33:11,14,16 42:15,22 46:8 48:16 60:9 63:5,14, 18,20,25 64:9 68:6,13,20 69:1,21 73:1,9,17 82:23 83:4,25 89:19	29 76:24	34 94:4
2019 39:7 43:8 59:1 61:17 62:10 65:9 69:9,14,18 72:22,24 73:1,8,14,17 80:11,19 83:5,25 84:15 90:4	3 99:5	35 94:2
2020 19:10 20:20 39:13 43:10 61:8,17 62:10 65:15,16	30 4:2,12	<hr/> 4 <hr/>
	30th 64:9	4 42:9,10,14 43:25 45:6 48:14 58:1,2 82:13 85:1
	31st 68:6 69:9	4/15/20 78:17
		4/24/20 78:11,17
		445 87:2
		47 87:2

49 11:18	18:15 96:6,7	65:7,21 66:17,20 67:2 71:13,17,22 72:9 75:4 81:25 83:15,16,19 85:2, 23 86:4,5,6,9 88:23 89:7, 11,15 90:17,22 95:20 96:17 97:24
5	9	accident 14:24 15:2,5 91:23 92:4
51 74:15,16	9 96:19,20	accidents 94:19
52 11:17	9/7/22 96:6	according 64:10 70:10 72:11 74:12
53 11:17	90 73:9	account 70:16,21,22 71:24
56 11:15	92 8:13 73:9	accountant 29:13 31:19 80:7 91:16 97:18
59 11:13	9:00 99:3	accountants 64:7
5:00 99:14	9:02 4:12	accounting 8:18 31:22 32:10,11
6	A	accounts 22:14 24:11 31:24
6 11:3 86:10,11	a.m. 4:12 57:13,17 98:7,10 99:3 100:9,10	accurate 34:1
6.5 63:1,6	abbreviation 10:1	achieved 91:3
6:56 77:11	able 40:4 44:10 58:2 59:14 98:18	acquired 97:7
7	about 5:3,23 8:20 11:16,17 16:4,17 17:9 18:14 21:13 22:3 23:2 27:5,7,10 30:10 33:13 36:20 37:4 40:11 45:8,12,15,17,23 48:6,10,23 49:3,6,9 50:10,12 51:4 52:1,11,20 55:3,15 56:23 57:25 58:5,13,19,20 61:21 62:3,9 63:13,19,20 64:2	active 14:24
7 78:2,4,7,9		activities 9:15
7th 99:3,23		activity 29:11
8		



actually 12:13 99:10	94:2	already 35:14 82:22
add 74:12	ages 11:10,16	also 9:7,19 18:9,12 20:23 21:8 36:21 38:20 41:12, 19 47:3 90:8
administer 20:14	ago 5:18 65:8	always 23:21 35:7
administrative 20:11	agree 33:20 49:22 52:17 72:11	am 4:14 95:17
admonitions 5:23	agreed 39:19 53:15,16 54:1,2	amount 62:14
adopt 33:25	agreement 42:15 45:18 48:13 50:13, 24,25 52:9,17,24 76:8,18 77:25 78:19 82:9,10,12, 25 83:6,15,20 84:18 85:11 97:8	amounted 81:4,8
Advancedone 4:16	ahead 80:21	an 24:16,19 25:12 26:3 29:1,5 30:1 34:15 43:22 44:20 52:17 55:3 56:12 76:17 77:7 78:14,18 80:6 81:2 82:9 84:8 85:11 88:9,18,20 89:7,15 90:17 94:2 97:24
adverse 97:3	Alan 31:14,21 32:7,16,21,22 33:18 47:17,19,22 48:6 78:15 91:15 97:19	analysis 32:17 33:13,18
adversely 7:15	Alan's 32:15	and 4:18,23 5:4,19,23 6:9 7:11,19 8:5,9 9:2,7,17, 19,21 10:16,21 11:2,4,8, 9,15,16,18,24 12:2,4,9, 17 13:3,20,23 14:14,17, 21,24 15:4,22 16:2,5,16, 17,22,25 17:1,2,7,16,19 18:19,21 19:8,12,13,20 20:6,13,14 21:16,17,21 22:1,6,7,23 23:3 24:18 27:17 28:15 29:15,19 30:2,6,12,19 31:18,20, 21,24,25 32:2,5,9,10
affect 36:6	all 4:20 5:22 9:4 10:21 15:19 17:3 19:24 21:4,24 23:6,18,21 27:17,22 29:13 30:23 31:20 33:2 38:5,15,20 39:21 41:9 42:2 45:11 46:11 51:17 52:4 54:9 56:4,17 57:24 62:3 65:4 67:11 68:20 69:5 74:22,24 76:17 79:16 82:3,22 83:24 86:15,16,24 87:18 88:10, 15 90:2,23 94:15 95:14 99:20 100:1,4	
affected 92:5		
affirmation 88:13		
affixed 23:25 24:4		
after 13:19 17:9 18:16,18,24 19:5 28:13 53:5,17 54:3 64:19 65:12,18 68:20 69:11 76:24 90:25 98:24		
again 58:2 72:22 80:8 84:18 87:9 99:4		
age		



33:9 34:7,14,18,20 35:2, 19,22 36:6,13,19,20 37:1,4,22 38:4,11,12,15, 17 39:19,22,25 40:12,15, 23,25 41:12,18 42:12,16, 17 43:6 44:4 45:3,7,11, 18 46:12,14,16,24 47:9, 12,13 48:24 49:2,5,18 50:5,12 52:5,23 53:3 54:4,18,22 55:6,16,21,22 56:4,5,12 58:1,10,21,22, 23 59:4,5,9,11,12,23 60:3,7,11,14,24 61:6,17 62:10 63:4,18,20 64:7,21 65:5,12,14,18,19,21,22 66:4,6,14,21 67:1,6,9,17 68:8,12,16 69:10,13,23 70:2,8 71:12,19,20 72:17 73:1,4,17,20,25 74:3,13, 24 75:10,16 76:21,22,24 77:4,10,15 78:3,11,16,25 79:22 80:14,21 81:22 82:16,17,25 83:4,9,22,25 84:7,10,13,15,17 85:15, 17,18,19 86:2 87:18,23 89:1,18 90:4,9,15,18,19, 21,25 92:2 93:9,13,16, 18,19 94:5,6,10,13,14, 20,21,24 96:4,11,14,19 97:6,9 98:16,20,23 99:4, 7,22,24	another 9:7 21:22 24:21 44:11 63:18 67:12 71:24 74:3 77:15 97:25 answer 48:20 50:21 53:21 80:21 92:2,20 95:15 96:2 answering 95:18 anticipation 7:2 any 6:13 7:23 8:5,14,17,22, 25 12:11,20 13:6 15:8,13 22:9 23:1 24:13 25:7 30:23 31:11 33:16 35:1 36:23 40:19 46:21 47:18, 25 48:5 52:13 56:22 58:21 83:14,19 87:7 90:6,12 94:14 anybody 12:24 88:17,18,20 anyone 7:6 12:21 29:10 30:23 31:3 32:16,21,22,23 33:11 52:8,12 53:8 56:23 anything 45:22,23 46:21 49:5,8,21 51:4,20 64:2 77:5 87:20 90:17 94:2 96:17 Anyway 73:12 apartment 26:3 apologies 73:11 apparently	65:20 appearing 4:21 appears 48:13 73:22 74:1 76:23 77:1 80:13 application 24:5 applied 51:13 applies 51:9 appreciate 36:1,2 appropriate 55:4 97:25 approximate 11:10 approximately 43:23 44:12 85:2 April 12:3,21 15:7 29:6,9 30:12 31:17 63:14,24 64:8,9 69:1 84:15,17,18, 19,21 85:2,13 are 4:5,15 5:3,10,11 13:12, 20,23 17:4 20:6,10 21:8 22:9 29:20,22,25 30:4 32:5 35:16,18 36:2 37:8 40:4,5 44:19 45:23 50:6 52:12 58:2 67:18 72:4 81:9,12 89:22,23 91:5 93:18 95:1,3,15 96:10 97:2 area 21:4 91:10,12 94:21
--	---	--

areas 94:21 Arizona 34:14 around 8:11 16:11,12 17:22 18:1,23 22:6 23:6 26:23 27:14 28:3 61:13 75:21 77:13 94:9 arrangement 39:18 as 6:2 8:25 9:4,9 12:5,7,9 13:18 14:18 16:23 20:1 24:17 27:23 28:22 30:17 41:6 42:7,9,13,14 44:19 53:2,9 54:20 63:24 64:8 67:7,14 68:5,6 69:1 74:6 76:18 78:9 81:2 84:14 87:16 94:16 96:6,22 99:21 ask 30:10 41:25 44:4 54:6 63:13 74:21 86:8 87:25 96:3 97:10,18 99:11,12 asked 38:11 41:7 72:17 75:18 76:3 98:13 asking 5:12 39:23,25 41:9,24 44:7 53:1 81:12 85:9,23 aspects 20:2 assembled 31:23 assets 30:5 72:10	assuming 64:13 at 4:12 6:2 7:15,18 8:15 11:25 13:11,18 14:14 15:14,16,17 16:3 17:8,11 18:4,9 19:8 22:8 23:1 26:19 28:13 29:3,16,17 30:19 31:21 32:3 33:16 34:17,23 35:13 38:21 40:15 42:4 44:3 45:8,25 46:24 48:9 52:4 53:17 54:4 56:21 57:10,12 59:17,23 60:15,22 63:19 65:14 67:25 68:9,10,11, 25 70:1 71:8,15 73:20,25 76:5,7 77:11 78:23 79:4, 25 80:8 81:14 82:9,12 83:24 84:2,7,17 85:17 86:23 87:5,23 88:10,11 89:1 91:3,21 94:15 95:13 97:4 98:3,6,24 99:3,14 100:9,10 attorney 4:19 74:21 attorneys 37:23,25 38:3,14,16,21 attribute 93:18,23 attributes 90:8 94:8,22 audibly 48:20 audio 50:19 authority 24:10 54:10 55:17	authorized 42:17 availability 21:13 22:1 aware 17:7 37:12,13 45:3 52:12 56:12 97:17 away 19:1 <hr/> <p style="text-align: center;">B</p> <hr/> back 16:20 28:24 48:12 51:3 52:6 53:14,24,25 57:9,18 58:1 63:10,14 64:3 65:21,22,25 71:11 73:25 75:1 77:7 79:20 87:23 98:3,11,13 99:4 background 33:9 bad 11:16 19:3 66:17,24 67:2 68:9 75:16 81:14 91:22 92:4 balance 30:5,16 32:9 68:5 bank 24:11 70:16,20,22 bankruptcy 79:8 bark 17:5,8,11 28:9 basis 32:25 Bates 87:1
--	---	--

Bay 91:11 94:21	14:14 15:18 28:25 39:4, 10 40:11 43:3,23 44:17 75:10,19 84:5 85:3,7,12 89:11 98:13	best 6:4,10 7:24 43:23 44:20, 21 46:3 64:25 98:18
be 5:4,24 7:10 8:11 17:2 23:24 24:4 29:14 35:21 38:13,17 42:5 44:10,18, 19 47:14 53:11 54:18 55:22 58:4 62:11 63:12 65:10 74:15 76:20,24 77:21 78:1,2 79:22 80:13,19,24 82:15,18 83:21,25 84:13 88:25 89:5,6,13 98:2,18 99:8,9, 22	began 21:6 begin 100:1 beginning 4:19 87:5 99:3 behalf 53:16 54:2 being 28:13 31:10 38:6 41:7 59:17 60:15 74:16 belief 13:10 believe 11:23 13:8,25 15:10 16:5,25 17:15,21 18:1,16 19:11,15 22:2 23:6 24:6, 12,21,22 25:6,9,17 27:21 31:1 32:6 34:16 35:9 39:3,14 41:11 42:4 43:8 44:24 50:22 51:6 56:3 59:13,18 61:13 65:12 74:10 82:24 83:3,6 85:14 86:20 believed 21:12 beneficiaries 13:23 benefit 14:18 Bernardino 4:11 75:7,13	better 61:12,18 83:15,20 between 6:8 29:14 58:21,22 65:17 84:14 91:14 92:6 beyond 8:6 big 90:1 bill 20:13 billing 35:19 bills 32:25 62:12 birth 11:2 bit 75:24 88:1 95:10 blame 94:13,15 board 36:11 40:20 68:21 69:6 86:16 bonus 85:23 bosses 99:25 both 18:14 bottom 63:19

bought 59:6	14 59:21,25 60:10,19 61:4,15 62:13 63:9,10,12 65:7,15 66:9,18 67:8,18 68:8 70:15,18,20 71:7, 11,23 72:6,11 74:9,10, 11,20,22 75:21 76:5 77:3 78:16 79:2,7 82:8 83:9 87:19 88:18,20 90:1,2,7, 23 91:14 92:8 95:10,25 96:17,25	came 28:12 50:13 59:24 60:7, 11
break 55:4,7 57:15 63:2,7 98:1, 8,24		can 11:8 33:3 36:2,24 37:1 38:24 39:6 40:4,11,12, 13,19,21 41:3 42:6,19 43:1 44:16 48:2 53:22,23 54:23 58:1,4,9 60:6 62:20 63:10,11 66:22 68:1 71:4 74:5 76:15,25 77:17 81:22 84:22 86:2, 13 87:13 91:25 92:2,12, 15 97:6,18 99:12,13
break-even 32:17,23 33:13,18		can't 7:23 28:18 29:18 31:10 39:4 43:20,21,22 44:2,3, 5,8,15 46:1,4 48:9 56:3 58:17 60:5,20,21 84:8 85:4 97:20 98:17
breaking 94:25	buzz 88:23 89:1,4	care 21:17,18 29:13 31:20 33:1 46:13,17,22 62:16 63:9
brief 5:24	by 4:7 5:9 10:8,16,19,21 13:17 16:22 21:6 27:24 28:11,13 33:18 35:17 37:8 38:13 39:19 41:2 42:18 44:10 47:9 51:2 54:11 55:14 56:9,13 57:20 63:5 67:19,23 68:4 70:7 71:16 74:14 76:24 78:6 81:1,24 83:9,10 88:3,15,16,21 90:16 91:1 92:7,12,15,24 99:3,4	case 4:11 64:13 68:5 95:8
bring 35:2 44:4 64:15		cash 47:12
bringing 40:3 64:14 69:5		Catanzarite 4:20,21 5:9 28:11 40:17, 21 41:2 42:12,18 51:1,2 53:23 54:8,11 55:5,9,13, 14 57:2,6,9,14,19,20 67:16,23 70:3,7 71:16 77:21 78:6 80:23 81:1, 20,24 92:7,23,24 98:2,5, 12,20,23 99:2,7,11,18,20 100:3
brother 6:25 11:17 16:16,24 17:3 26:16,20 27:4 36:11		
brought 36:10 37:21 38:9,11 64:18 68:21		
building 39:3		
business 27:15 28:4 34:25 35:1,2 46:25 47:12 48:24 62:6 71:12 75:12 90:2 92:11 93:19 94:18,24 95:1,3 96:9 97:2	calculator 81:22	
but 5:4 8:7 9:24 15:25 17:14 18:16 23:14,24 24:7 27:18 29:8,17 31:10 33:8 35:10,22,25 36:16,24 37:15 42:24 43:22 46:1,4 48:3 49:13 50:2 51:13 52:24 53:12 56:9 58:13,	California 4:10 24:22 25:6,11,12 34:15	
	call 9:3 42:13	
	called 6:22 9:7 13:14 17:4 28:8 30:1,5	
	Calls 53:20 80:20	



catch 66:21	57:4 77:8 80:20 83:10 97:24 98:4 99:17,19 100:5	12:17 15:21
Center 75:12	Christmas 60:9	communicating 56:1,2,4
CEO 9:19 16:2 17:2 34:13 55:22 89:5	city 25:11,15 32:5	communication 48:6
certain 36:12 48:2 78:18 85:16	CIVSB2201281 4:11	communications 58:20
CFO 96:11	cleanup 36:13	companies 90:19
change 7:14 16:4 53:17 54:3 93:23	clear 29:14 58:5	company 9:7 11:21 14:22 15:11, 21,23 17:10,14,16,17,18, 19 18:10 20:7,11,15 22:8,18 24:21,23 32:24 34:8 38:20 43:7 52:13,14 53:18 54:4 55:23 56:10, 13 62:1 63:24 64:9,15 69:2,6 72:4 74:9,19 75:2 89:14 96:15
changed 15:25 43:13 78:18,22	clearly 92:1	company's 15:19
changes 78:24	close 21:16,21 78:3	compensated 83:4
characterize 46:7	collections 32:18,24	compensation 37:9 39:18
charge 36:16,17 41:21	collective 31:23	complete 8:8
chat 40:18	come 31:25 48:12 50:25 52:23 57:9 59:25 60:4 65:21, 22,25 78:16 98:3	comptroller 48:25
check 24:1 71:21 72:9 75:1	comes 35:20	concentrate 98:17
checks 23:16,18,22 24:8,13	comfortable 95:17,19	concern 79:16,17,21
chief 16:6 96:10	coming 34:6 86:16 88:6,10,14 89:7,16	concerning 29:10 58:6
children 11:5,9 99:16	comment 7:15	
Cho 4:22 38:4,17 40:15,19 45:7 53:19 54:25 55:2,8	common	

conclude 99:21	52:9	47:1,4,7 48:18,25 49:3
concluded 100:10	contrary 46:14	53:4 55:19,23 56:10,14
concludes 7:10 69:11 100:8	contribute 91:16	58:6,8 62:2 69:3,7,21,24
condition 29:2,6 30:11,17 31:5	contributed 90:3,13 91:11	72:5,12,18,24 73:2,6,15,
conference 4:17	contributes 94:25	18,23 75:25 79:18 80:3,
confuse 67:18	controller 31:19	12,15 82:1,7,19,23 83:2
connections 90:19	convenience 67:20	84:5,15 85:13 88:4,16
consequences 97:4	conversation 56:19 64:20 65:17 66:3	89:20 93:14,16 94:7,11
considered 60:24	conversations 22:9 47:17,18,22 48:5	96:14
contained 45:23	50:9,15 56:22 58:22	correction 88:4
continues 72:16	convey 50:7	corrections 7:11
continuously 19:8	copy 7:10	costs 62:6
contract 35:7,10,13 37:16,18,19	corp 70:17 74:24	could 21:1 23:14,24 34:9 35:21
38:6,7,25 39:12,16,17	corporate 22:17,20 23:4 74:21	36:1 42:23 44:18,19
50:13 78:24 79:17	corporation 14:1,2,8,10,13	47:13 50:25 60:10,17,18
contractor 8:25	correct 10:14,22 12:22,23 14:15,	64:23 65:5,6,7 66:8,10,
contractor's 9:23	25 15:24 16:6 20:8,15	11,15,17 71:2,5 84:16
contracts 20:3,13 35:14 89:24	21:14,19,22 22:21,24	86:7 89:9 98:18 99:4,24
contractual	23:11 24:5 32:13 35:4	couldn't 30:14 47:14 61:20 62:14
	36:7,20 38:18,22 41:16,	64:2 71:6 81:18 92:14,
	19,25 43:16 44:1,13	17,21,22 97:22
	45:9,20 46:5,14,18,22	counsel 4:17 7:5 77:19
		count 78:25
		county 4:10 25:24,25
		couple 55:5
		course 61:5
		courses

8:17,18	84:6,8 85:5	depo
court	dated	99:8
4:10,15,24 99:12	78:11	depose
cover	dates	71:23
34:9	60:13 75:17	deposition
COVID	day	4:1,6 5:3,13,19,25 6:12
39:10 75:21,24	60:11 61:3 99:19	7:10,19 33:7 96:3 98:25
CPA	De	100:8,10
32:2 70:15,16 71:10,12,	96:9	described
20,22 72:8 74:23 75:3	death	84:14
80:7	12:12 13:11 15:7,17	describes
CPAS	deaths	78:14
32:3,11 64:7	94:19	describing
created	December	41:6
89:1	68:6,13 69:9,18	did
credit	decided	6:24 7:2,6 8:2,5,7,9,14
90:6,7,12	16:19 17:2	9:21 12:2,4,11,20 13:3,
current	deciding	14 15:2,4,8 17:10,14,15,
9:19	34:7	19 18:2,12,14,24 19:17,
cut	declaration	25 21:25 22:3,14 24:13,
50:19 54:5 71:8	6:17,19	16,19 25:7,12 26:11,15,
cutting	decline	19,22 27:19 28:15,19,22
20:6 36:3,13	94:7,14	29:9 30:23 32:16,21,23
	declined	33:11,12 34:13,18,20
D	93:13,14	35:18 42:2,4,6 43:6
	defendant	44:23,24 45:11,22 47:9,
dad	4:23	18,21 49:7 51:4,17,18,
14:21	definitely	19,20,25 52:7 53:8 56:17
darn	36:8 70:15 88:19 89:9,11	59:11,25 60:3 61:1 67:24
69:6	deliver	68:8 73:9 75:17 76:19
data	59:11	79:8 81:2 86:23 87:7,10,
31:24	delivered	19 97:12
date	84:13	didn't
9:24 11:2 16:10 26:25	Denise	28:2 33:1 34:2,4 42:5
27:3 42:24 43:21,22	18:8,9,20 89:15	49:5,21 50:20 55:16
44:2,5,7,9 76:10 83:7,8		58:5,24 59:15 61:20
		62:24,25 63:9 64:4 66:21
		68:9 76:20 78:23 81:17
		86:3 91:9,10,24 92:20

94:20	discharged	14,18,22,25 69:13,19
died	65:12,18 72:16	70:13 71:25 72:14,20
12:21	discuss	74:16 75:14,18 77:8
difference	7:6 22:1 85:19	78:7,11,20,22 80:15
6:8	discussed	81:22 84:19 86:17 87:4,
different	50:1 83:24 84:13 98:24	17 89:23 90:5,11,15 91:1
65:14 74:18 83:15,20	discussing	93:1,2,6,10 94:1 95:6,11,
88:1 92:10 95:11	64:14 85:22	13 96:12,23,24 98:3 99:3
difficult	discussion	doctors
46:16	23:2 29:1 53:7 83:14,19	46:14
difficulties	85:11 86:1	document
97:9	discussions	40:11,24,25 41:3,5,6,10,
difficulty	7:5 24:17 33:13 58:6	24 42:7,13,20 43:15,19
30:24	distributed	44:11,13,23 45:6,12,24
direct	74:24	48:17 49:6 55:15 56:17
35:10	distribution	62:23 67:12,25 68:11
directly	71:25 74:14	69:1 76:19,22 77:16
56:2	distributions	78:14,17 82:16 84:3,4,
director	61:25 70:2,9,10,17 71:17	13,24 85:12
15:11 22:18 96:22,23	72:3,12 74:1,2,13,25	documents
directors	80:14	6:13,15 67:18 68:4,8
15:13	divide	86:22
disabled	74:13,14	does
15:5	do	14:6 27:1 31:8,14 39:13
disagree	5:2,6 6:1,5,8,15,20 7:21	43:2 60:18 63:4,23 76:3
87:7	8:25 9:2,11,14,25 11:21	77:11 78:25 90:4 94:1
disagreed	14:4,17 16:8,14 17:24	95:11
49:2,6 82:17,18	18:19 19:2,3 22:9 25:24	doesn't
disagreement	28:12 29:1,5,19 30:11,16	54:20 64:1 80:1,2
52:1 53:9	31:3 33:16 36:3 37:19	doing
Disaster	38:24 40:14 43:18 44:8	35:9 61:13,15,18,19,22,
28:8	45:4 46:16 47:25 48:5	23 63:24 64:15 90:16
discharge	50:6 54:10,12 55:17	99:8
19:9	56:21 58:21 59:1,16,22	dollar
	60:14 62:9 63:2,13	62:14 97:21
	64:10,13,19,20,25 65:23,	dollars
	24 66:1,2,11 67:24 68:3,	47:7 62:1,8 83:21 97:21

don't 6:21 9:23 15:14 16:10 17:14,22 18:16 19:22 21:2 23:15 24:15 25:14, 17,21,22 27:2,17 28:17, 18 29:7,8,15,17 30:18 31:1,7,8,12 32:19,20 33:15,24 34:4,5 35:10 37:15 39:2,7,9,10,14,20, 21 42:4,21,23,24 44:14 45:13,25 48:11 49:8,12, 13,14,15 51:15,22 52:3, 11 54:9 56:3,25 58:25 59:18,21,24 60:10,12 62:4 63:15,17 64:1,3,4,5, 6,7,17,24 65:21 66:9,18, 19 69:15 70:14,18 71:14, 20 72:21,23 74:9,10,11, 18,20,21,22 75:2,20,22 76:6 77:5 79:2,5,6 80:4, 5,6,22 81:14 82:8 83:8 84:6 85:5,7,8,18,25 86:6 87:8,23 88:17,19 89:3,4, 21 95:7,13,17,18 96:16, 24 97:16 99:13	Drive 75:12 drove 59:20 due 83:21 during 20:19 30:6 59:9 72:17 duties 22:15 31:18 <hr/> E <hr/> e-mail 40:13 78:10,15 earlier 11:21 49:19 68:25 71:18 78:15 early 28:25 33:11 Edison 35:7 89:24 91:23 education 8:2,5,14 effective 83:1 efforts 8:15 eight 51:20 67:15 either 34:1 Elizabeth 4:14 100:4 else 7:7 24:10 36:13 45:22	88:4,17,18,20 emphasize 66:6 employed 10:8,16,18,21 19:8 56:7, 9,13 employees 86:16,24 88:16 employment 58:7 59:10 76:8,17 77:24 78:18 82:25 85:11 encounter 28:15,18 end 71:9 72:16 76:21 87:5 94:5 enough 6:24 16:3 31:13 33:3 50:11 entail 19:17 entailed 20:4 enter 20:13 entered 52:8 76:18 enterprise 14:19 entire 20:19 entitled 6:4 7:11 96:3 equity 30:6
---	---	--



estate 47:4 estimate 6:5,10 39:6 43:23 44:16, 20,21 92:12,15 97:15 estimated 44:12 84:3 et al 4:9 even 21:3 44:5 63:2,7 ever 5:13 12:24 24:13 25:7 26:5,8,11,15 34:19 47:18,21 52:7 58:24 59:17,18 61:12,18 76:19 83:19,24 85:22,25 88:22 everyone 36:1 67:18 everything 36:13 exact 9:24 11:16 16:10 17:23 25:14 27:2 39:2,5 42:24 43:21,22 44:2 72:21 84:6,8 85:4 exactly 6:21 28:18 29:7 37:15 39:20 45:13 46:2,5 48:11 51:15 58:18 60:5,11,21 71:6 79:6 EXAMINATION 5:8 example 22:11 excited 27:5,7,10 89:11	excitement 27:23 89:7,15 90:22 Excuse 20:24 executive 16:6 52:13 90:17 96:10 exhibit 42:9,10,14 43:25 45:6 48:14 58:1,2 62:17,18, 20,22 67:14,21 73:5 76:8,11,12,15 77:16,17, 19,22,24 78:2,4,7,9 80:8, 9,10 82:13 85:1 86:10,11 96:6,7,19,20 expecting 80:18 expense 63:21 expenses 30:2 34:9 48:24 <hr/> <div style="text-align: center;">F</div> <hr/> fact 89:18 fair 6:24 16:3 19:24 21:7 31:13 33:3 36:9 47:6,14 50:11 53:11,12 56:9,21 60:23 61:8,11,16,24 88:25 89:6,13 92:8 familiar 17:4 27:1 29:25 30:4 35:16,19 37:8 38:5 family 21:16,24 28:4 60:25 61:24	far 69:7 91:8 99:22 fashion 30:24 fast 36:3 father 14:23 21:17,18 46:12 favorable 88:13 feel 50:14 61:1,22 67:1 95:17,18 98:17 felt 61:4 66:17,24 67:2 few 5:18 6:14 9:24 37:21 38:11 50:3 55:10 67:4 field 19:23 20:1,6,12,17 21:5, 8,9 35:17 89:22 figure 56:18 file 79:8 filed 4:9 6:22 96:6 filing 96:5 final 32:12 finance 8:20 finances 62:10 63:10 64:3
--	--	--

financial 29:2,6,10,16,19 30:11,24 31:5,25 32:12 62:13 80:9,10 97:3,9,18 financials 31:20 61:21 80:1 91:5,15 fine 40:19 55:8,12 fired 64:20 69:10,11 firm 4:15 32:11 first 8:1 19:2,4 24:17 28:15, 17 30:25 43:19,24 45:3 54:9 60:6 69:3,17 78:2 fiscal 47:11 five 19:6 51:19 Florida 25:8 flows 47:12 folks 41:24 67:4 following 8:15 for 4:10,21,22 5:12 6:12 9:15,23 10:1 11:19 14:25 17:10,11 18:25 19:3,4,6 22:6,10,14 23:20 24:21 25:4 27:15 29:16 30:2 31:15 32:24 35:7,9 36:11 38:12 39:18 41:18 42:10, 16 44:4,7 45:7 49:20,23	50:20,25 52:13,18 53:20 59:9 61:12 62:16,18 63:12,18 65:11 66:25 67:20,21 68:5,12 69:6,7 71:21 75:1 76:12,14 77:6 78:4 79:17 80:1,20 81:23 83:4,22 85:11 86:11 88:6,15 89:7,16,19,25 90:6,12 92:9 94:14 96:5, 7,20 97:12 98:14,20 99:2,18 forgive 9:17 59:6 70:3 forgot 6:22 41:13,14 formal 8:14 22:20,23 formally 75:15 foundation 53:19 80:21 four 69:3 Francisco 25:18 fresh 85:20 from 4:15 8:3 15:4,22,23 19:9 29:10,16 31:24 40:5,7 43:15 44:1 49:19 56:9 57:16 61:6 62:1 65:13 67:25 68:21 69:14,23 72:4 74:19 75:22 78:15 88:19 89:9 90:20 91:7 98:9 full	66:22 function 19:12,13 20:11 31:22 32:8 functions 32:10 35:3 further 8:5 future 78:25 79:1 <hr/> G <hr/> galvanizes 90:18 gather 33:7 gatherings 60:15 gave 5:24 41:11 54:22 gee 83:15 general 22:10,13 generate 19:25 35:18 63:1 generates 20:7 generating 32:12 35:17 gentleman 31:14 32:1 gentlemen 36:19
--	--	---



<p>get 20:13 21:25 33:8 71:15 78:16 79:23 81:17,21 83:15,20 84:18 91:9,10 92:20 94:20 98:21</p> <p>gets 21:24 65:19</p> <p>getting 20:3 34:25 56:5 62:5,7 80:5 88:11</p> <p>give 5:3 7:23 11:8 26:25 39:6 42:6 44:16 55:5 84:8 85:1 90:5,7,11 91:25 97:15 98:18 99:12,24</p> <p>given 7:10 37:16,19 38:9 68:7 71:19,21 72:10 86:21</p> <p>gives 6:9</p> <p>gleaned 49:19</p> <p>glitch 50:18</p> <p>Gloria 11:5,9 12:1,2,4,5,11 13:11,21,24 14:14,17 15:8 21:13,25 24:18 27:7 34:7 39:19 41:25 44:23 51:25 54:20 57:25 58:5, 10,21,22,23 60:24 64:25 66:2,5 74:2,13 84:13 85:2 86:3 87:11 89:14</p> <p>Gloria's 38:16 52:1</p> <p>go 5:22 8:9 16:20 18:14,25</p>	<p>28:15 33:7 50:24 51:3 52:6 53:14,25 61:7 69:9 72:14 73:4,25 76:21 77:6,15 80:21 87:23 93:1,2 99:4</p> <p>God 11:12</p> <p>goes 71:11 72:6,7 94:23</p> <p>going 5:22 25:9 42:9 46:22 47:11 48:24 51:3 57:12 61:8,11,18 65:20 67:13, 14,16,19 69:9,16 73:10 76:11,14 77:15 78:1,2 79:6,18 83:16 89:5 93:18,22 96:4,19 98:6 99:21 100:8</p> <p>good 4:20,22 5:10,11 9:11 27:9,19 61:14,19,20,22, 23 69:6 77:22 98:2,4</p> <p>goodness 41:13</p> <p>gosh 18:22 19:6 41:14</p> <p>got 17:24 18:20,24 19:5 49:18 54:5 74:25 86:8 91:11</p> <p>gotta 35:1</p> <p>gotten 34:19</p> <p>graduate 8:3</p> <p>great</p>	<p>5:12 57:4</p> <p>gross 68:13</p> <p>groups 21:9</p> <p>grow 34:8</p> <p>guess 6:9 21:1,3,5 72:13 73:3 77:13 78:23 81:13 82:21 96:17</p> <p>guessing 6:5</p> <p>guy 20:18 31:23</p> <p>guys 19:23 20:1,6,12 21:5,8 85:17</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>H-U-E-R-T-A 37:3</p> <p>had 5:13 8:11,22 22:12,13 24:10 26:5,8,20,22 27:13 28:3 29:8 32:2 34:18 35:7,8,10,13,14 37:21 44:13 45:14,18,19 46:1,4 47:22 49:10,16 50:9,13, 14 51:16 52:8,14,23 53:15 54:2,13,18 56:18, 19,22 57:24 59:8 61:2, 12,18 64:7,9 65:1 69:2, 14 72:22 74:8,10 78:24 81:6 82:22 88:1,9 89:10, 24 90:13 91:22 92:9 94:6,19,20,21</p>
---	--	---

half 18:21	23 33:6,16 34:13 35:9 37:1,16,18,22,23,25 38:12,13 39:9,23 40:10 41:25 43:2,14 45:1,7,16 46:4 47:16,18,20 48:2, 10,20 49:9 50:6 51:25 54:6,10,20,23 55:16 56:23 58:13,14,17 59:15, 20,24 60:10,17,18 62:9, 15 63:13 65:3,14 66:8, 21,24 67:17,24 70:4 71:22,23 72:8 74:20,23 75:2 76:25 77:19,22,23 80:2 81:2,4,7 83:8 84:16 85:21 86:7,17,20,25 87:4,6,8,22,24 88:2,3,22 91:15 94:1 96:18 97:8, 16,17 99:14,16	91:24
hand 5:1 44:23 66:3,5	heard 17:9 33:24 34:1 88:22,24	
handed 45:6,8 53:2 64:21 85:1	hearing 48:2 66:2 92:1	
handle 32:7	held 4:11 13:17	
handled 36:14	help 17:2 34:8	
handling 47:6	helps 93:1	
Hang 76:9	her 10:18 12:4,12,13,15 13:3,8,11,18 14:21 15:7, 17 23:23 26:15 28:22 37:22,23,25 38:12,13,15 45:1,14,19 46:17 48:6,25 49:11,17 50:24 52:22 53:14,16 54:1,2,6 59:23 60:2 65:1,4 66:19 70:16, 20,22 84:14	
happened 66:9 91:14 92:3,4,6,10 94:8	here 5:23 6:12 7:3 54:20 63:1, 6,19 68:17 70:8 76:23	
happens 38:17 90:25 91:2,3	Here's 63:18	
happenstance 93:19	Hey 54:25	
happy 94:16	high 8:2,3,6	
hard 94:19	him 16:17,19,25 17:1,2,4,9 18:2,16 21:3 26:8,11 34:21 46:13,21,22 58:12, 14 64:18 65:22 66:6 71:23 72:9 83:1 86:5 90:11 97:10	
harder 40:23		
has 9:12 14:24 47:24 53:17 54:3 90:18 95:13		
have 5:12 6:13 8:5,17,22 12:24 13:14 15:9 20:21, 22 22:9,14 23:14 24:12, 16,19 25:12 27:2,19 29:1,5,15,17,24 31:9,12,	he 15:4 16:1,14,15,18 17:21,24 18:4,7,18,24 19:2,5,6,8,15,18,21,22 20:18 21:2 22:3,5 24:21 25:4,9,13 26:16,22,23 27:13,15,19 28:3,9,12 31:15,19,23 32:2 34:14, 17,20 36:15,17 41:21 55:18,25 56:8,9,13,18 65:1 66:25 67:9 75:20 87:17 88:2 89:11 90:1,25 91:15 94:13 97:9	
	he's 9:19 11:11,12,13,17 15:5 22:5,6 27:14,18 28:3 69:11 72:17 88:6	
	hear 25:7 34:2 50:20 65:5	



hire 16:19 17:2 22:4 34:8 37:8 61:7 89:18	29:7,24 35:16,18,19,20 36:3 37:4,14 43:18 46:7 49:21 60:3,5 63:11,23 64:4,6 69:13 70:22 71:1, 4 74:23 80:6,17 93:25 96:16,25 97:12	41:14 42:9,22,24 43:12 44:3,7,8,15 47:24 49:20 50:19 51:3 52:11,15,18, 19,24 53:1,10 56:19,20 58:12,13,14,24 59:25 61:2 62:3,4 65:8,25 66:9 67:9,12,13,15,17,19 68:1,9,10 69:9,16 70:14, 15,16 71:8,10,12,13,20 72:8 73:9,10 74:11 75:16,20 76:11,14 77:6, 15,22 78:1,2 80:6 81:13 85:9,16 86:5 87:12,15 90:15,17 91:4,5,24,25 92:1,19 93:5 94:1 96:3,4, 19 97:14,16,17 98:15
hired 16:1,5,8,14 26:20,22,24 28:13	however 7:13 79:25	I's 77:20,22
hires 33:17	Huerta 20:22 37:3	I'VE 30:7 40:8 65:13 67:11 86:10 88:24 98:16
hiring 16:17,21,22 22:1 23:2 27:5,8,10,24 58:10	hundreds 23:21 67:9	identification 42:11 62:19 67:22 76:13 78:5 86:12 96:8,21
his 7:6 17:18 19:12,16 27:24 28:20 37:10 41:13,14,15 58:7 66:13 72:17 80:18 85:24	hurt 80:3	identified 42:14
hold 8:25 55:2 77:24	husband 10:18 46:17	identify 4:18 44:10 78:9
holiday 60:8,15	hypothetical 53:20	if 5:1 9:3,8,25 11:4,8 15:8, 13 17:14 19:17 21:2 23:1 25:21 26:25 30:20 31:3 33:20 34:1 36:2 39:7,10, 11 40:4,25 44:9,14 46:1 49:2,8,13,20 51:4 53:15, 21 54:1 55:7,17 58:1,9, 12 59:24 68:1 70:1 73:4, 25 74:5,12 75:18 76:2 77:6 79:11,25 80:4,8,18,
home 40:5,7 46:21 75:22	I	
honest 42:5 62:11 76:20	I'D 5:18 8:1 16:20 18:23 19:23 20:21,23 40:23 44:21 55:4 62:11 94:23 97:25	
hope 98:21	I'LL 5:24 40:14,15 42:12 64:25 65:10,13 69:17 70:20,24 73:13 78:9 80:23 85:19 93:5	
hour 55:3 97:24	I'M 5:11,12,22 6:4 9:24 10:2, 10 11:16,18 12:17 13:16 17:13,22 18:22 22:12 23:14 24:25 25:22 27:3 28:6 29:3 30:14 32:19 33:1,22 34:3,6 40:7,8,9	
house 46:14,17 59:2,11,23 60:2,4,8,16,22		
houses 49:14		
how 5:10,11,15 8:20 9:17 13:3 15:13 17:19 28:15		

21 81:3 82:8,12,20 84:2, 10,17,22 85:7 86:5 88:17,18,20 89:21 91:25 92:1,3,25 98:18 99:12, 14,24	68:20 69:5,10,11,14,16, 17 70:15,20,22 72:14,15, 16 73:4,14,17,21 74:17 75:7,12,25 76:2,3 78:18 79:8,20,22 80:11,19 81:6 82:3,10,16 85:2,13,23 86:10 87:20 89:18,19,22, 24,25 90:4,5,9 91:3,10, 23 92:10,11,13,16 93:16, 19,22,23,25 94:5,10,20 95:1,3,17 97:17	injury 93:20
Ignacio 20:22 21:1,7 36:20 37:1		input 22:10
Ignacio's 37:2		insurance 20:13
image 23:25		insurances 92:9
imagine 46:11	Inaudible 50:18	interest 13:11
immediately 94:7	incarcerated 18:5,12	internal 32:8
imply 90:15	include 32:8	into 13:12 32:24 43:7,24 46:21 52:8 72:6,8 75:4 76:18 84:5 94:24 97:3
in 4:7,9,25 5:3,19 7:2,17,19 8:4,22 11:23 13:6,8,10, 11,17 14:24 15:3,9,19 16:15,18 18:2,14,16 19:6,10,13,23 20:1,5,6, 10,12,17,18 21:5,8,9,25 23:16,20 24:5,11,13,22 25:8,12,13 26:3,11,16 27:16,17,18,19,23,25 28:3,4 29:6 30:11,19,23, 24 31:4,5,17,22 32:5,11, 16,17,18,25 33:12,14,16, 23 34:14,15,25 35:2,8, 15,17,18,23 36:3,15,17, 22 39:3 41:21 42:19,24 43:2,3,8 45:23 46:8,12, 13,17,20 47:10,19 48:1, 3,7,13,24 56:17 59:1,9 61:3,6,7,17,24 62:1,10, 15 63:5,6,14,24 64:14, 15,18 65:4 66:3 67:3	including 21:8 78:25	invoiced 35:22
	income 30:1 68:14,17,21 69:18, 24 70:6 73:5,22 80:11 81:10 93:10	invoicing 35:23
	Incomplete 53:20	involve 20:1
	incorporated 4:9 11:21,22,25 15:19	involved 19:22 35:23 62:15
	increases 78:25	irrelevant 95:22,24
	individually 13:6	is 4:6,15 6:1,21 7:23 8:2 9:4,9,15,17 10:8,11,16, 18 11:2 12:20,22 13:8,10 14:1,25 15:20,23,24 16:6,8,9,21 19:13,24 20:5,11,12,17,18 21:14, 18,22 23:11 24:5 25:23, 24 27:24 29:1 30:20 31:14,17 32:1,12 34:6 35:2 36:9,11,14 38:6,25
	industry 8:23 16:16,19 22:6 27:16,19,20 28:1,3	
	injured 14:23 46:12	

39:17 40:17,25 41:5,15 42:14 43:16,23 44:9 45:5,9,19 46:3 48:23 49:21 51:9,13 52:16 53:1,12 55:9,10,18 56:21 57:2,6,17 58:6 60:23 61:7,8,11,16 62:22 63:8 65:11,12,15,17,18 67:13 68:12,17,20 69:6,10 70:5,6,9 71:13 72:15 73:5,12 74:18,24,25 75:8 76:4,7,8,9,11,17,23 77:7, 13,16 78:9 79:1,2,16,18 80:9,10 81:13 82:3,6,13, 25 83:1 84:21,22,25 85:10,13,21,23 86:9 87:1 88:4,5,19 90:22 92:8 94:7,13,18 95:7,8 96:2,5, 10,11,16,25 97:2 98:10 99:2,15,22	45:1,8,12,15,17,18 46:1, 4 49:3,16 50:12,24 51:8, 13,15,19,21 52:4,5 53:11,17,23 54:3,4,19, 20,22 56:21 58:13 59:13, 20 60:8,10,23 61:8,11, 16,18 62:6,25 63:1,12, 13,19 64:1 65:5,8 68:1, 13,16,17 70:5,18 71:1,2, 11 72:8,22 73:1,24 74:13,14 75:1,8,10,12,17 76:10,14,18 77:3,10,22 78:3 79:20 80:13,16 82:17,18 83:9,12 84:13, 25 85:7,21 86:8,13,23 87:5,7,9,22,24 88:2,25 89:4,6,12,13 90:1,2,23 92:8,25 93:3,23 94:25 96:18 97:16 98:14 99:3, 19,22	January 11:3 19:10 61:8 63:20 65:15,16 68:12 69:11,14, 18 72:16 76:19 79:8 83:1 93:25 Jesus 36:21 join 28:19 Jordan 4:8,21 16:4,22 17:7,11 33:17 34:8 42:16 55:18, 19,22 78:10,11 81:7 89:19 90:5 94:6 Josh 41:13,15,18 43:16 44:1 June 99:3 just 6:17,21 12:1 13:25 14:20 16:2,17,24 19:18 22:5 23:3 26:3 27:13,15 28:2 29:23 31:10,12 35:12 37:22 40:8 44:3 45:13 49:15,16 50:8,22 51:15, 21,22 52:18,20 66:14,24 67:2 68:11 72:7 74:7,10 77:6 84:7 85:5,8 88:5 89:4 91:12 94:24 97:8,10 98:16,17 100:5
isn't 21:7 39:12 83:6 issue 34:16 87:20 88:9 issues 34:17 46:1,4 49:16 51:16 it 5:18 6:17,21 7:11,15 8:8, 11 10:7 11:23,25 13:8 14:1,6 16:11 17:22 18:1, 17 19:24 20:1,2,4 21:7 23:14 25:6,16,17,21 27:2,9 30:15 31:10 32:4, 22 34:1,2,9 35:9,19,20, 21,22 36:9 37:5,12,13, 15,21,22 38:11,13 39:7, 9,10,14,21,22,24,25 40:1,11,12,13,14,15,18, 20,21 41:11,25 42:2,3,4, 14,21,22 43:8 44:4,9,14	it's 6:22 9:4 11:15,18 13:8 28:8 32:6 34:1 37:3 38:6 40:23 55:3,4 59:8 62:23 65:15 72:6,7,9 73:8 75:7, 9 76:18 77:7,13 78:23 81:13 83:8,9 94:24 95:22,24 97:8,16,24,25 its 19:25 32:25 34:9 43:7 88:15 itself 89:14 <hr/> J <hr/> Jacobus 96:9 Jan 84:11	<hr/> K <hr/> keep 67:20 Ken 4:20 54:25 55:2 97:24 kept

39:23,25	known 16:15 27:15,18	leader 90:18
Kieu 4:15 42:12 53:23 70:3 99:8,24	knows 22:5	learn 26:19,22
Kim 38:4,18 45:7	<hr/> L <hr/>	learned 53:5
kind 21:3,4	labeling 67:20	least 16:3 38:21
knew 16:25 17:1,3 47:11 54:14,15,17 90:2	Lacks 53:19 80:21	leave 65:2,22 66:7
know 9:2,14,25 16:10,14,18 17:13,14 18:17,19 19:2, 4,17,22 20:3,22 21:2 23:24 25:14,21 27:13 28:2,17 29:7,8,19 30:12, 14,16 32:19 33:1,4,5,15 34:1,3,4,20 37:21,23 38:13 39:2,7,9,17,20 40:7,22 42:22,23 44:14 45:25 49:8,12,13,14,15 51:15,22 52:20 53:21 59:24 61:2,4,15 62:4,6, 11,12 64:4,5,6 65:24 66:13,14,15,17,25 67:1 68:7 71:5,14 74:5 77:8 79:6,11 80:4,6,18,21,22 81:14 82:8 85:5,7,8,17 87:8,23 88:17 89:21 91:17 96:24 99:15 100:1	lady 46:9,10	led 94:6
	Lane 59:2,7,17	ledger 22:10,14
	laptop 40:9	less 51:18
	last 5:17 28:6 37:2,4 41:13, 14 50:20 54:13 81:17 92:20 99:25	let 19:7 29:4 37:22 38:12 40:3,4,14,22,24 61:7 62:17 67:12,13 68:1,11 81:20 87:25 92:25 93:1
	late 39:12 99:8,13,16	let's 23:20 28:25 52:6 57:2,9 58:19 62:23 68:11 72:14 73:20 75:4 76:7 93:1 98:2
	later 37:12,14 50:2 78:15	letter 53:2
	laughed 87:16	letters 67:17
	lawsuit 6:23	liabilities 30:6
knowing 63:14	lawyer 95:25 98:23	license 9:23
knowledge 16:21 23:8 33:9 87:10	lawyers 45:1,6,14,19 49:11,17 50:10,24 52:5,23 67:19 77:3,4,5	licensed 9:15
knowledgeable 22:5		

licenses 8:25 9:12 like 8:1 16:20,24 18:17 19:18 21:4 22:15,16 27:14 28:2 29:23 35:1 38:12 39:22, 23 40:24 44:14 45:14 48:8 50:10,14,17 52:4,22 53:7 55:4 61:20,21,22 62:3,4,15 63:9 64:1,4,18 66:24 68:7,8 70:16 71:10,12,20 72:8,9,10 73:24 74:23,25 75:2,16 76:5 77:2,3 80:5 81:13, 18 82:10 84:6 85:4 89:21 90:23 91:4,14 94:18 96:16,24 97:25 line 42:16 76:23 list 63:5 little 61:16 75:23 87:25 95:10 live 59:9 lived 21:21 26:3 34:14 living 24:20 25:4,8,13 34:15 LLC 9:8 59:14 located 75:6 location 43:14 long 9:17 17:19 67:3	look 37:23,25 42:4 68:9,11 70:1 73:20,25 76:7 79:25 80:8 82:12 84:17 looked 29:17 38:13 65:14 67:25 68:25 84:2 86:20 looking 29:15 77:6 looks 73:24 loss 29:24 30:12 32:9 68:12 94:10,14,20 lost 64:9 69:2 93:16 lot 22:6 27:14 62:6 70:17 72:7 87:17,18 90:13 91:9,10,13,16 92:5,10 94:8,20,22,23 loved 46:17 Lucas 59:2,7,17 lump 35:22 <hr/> M <hr/> made 16:1 87:13 88:18,20,21 main 20:10 35:12 36:25 38:21 major 22:16	make 7:11 68:1 76:9,25 78:24 makes 86:9 95:20 96:1 making 36:12 94:25 management 93:23 manager 19:15 20:19 managers 21:4 managing 9:15,22 10:1 manner 36:4 manually 24:7 many 5:15 15:13 60:3,5 71:1 March 75:25 Marcos 20:22 36:20 Marcos's 37:4 mark 42:9 67:14 marked 42:10 62:18 67:21 76:12 78:4 86:11 96:6,7,20 married 18:4,7 massive 94:10
---	---	---

material 94:7	22:15 31:9 35:21 43:2 49:15 50:21 53:15 54:1 59:4 60:19 64:24 66:15 72:3 75:2 87:19 91:1	81:13 82:1,4,6 83:17 89:20 90:5,11 91:2,8 93:10 94:6 97:21
math 68:9 81:14		millions 47:6 62:1,5,7 71:1,2 83:21
matter 4:7	meaning 38:16 85:17	
may 4:2,12 7:14,17 12:4,7,9 23:16 24:11,13 25:8 26:5,9,13,17,25 27:23 31:6,9 42:15 43:25 45:7 46:3 48:16 56:8 58:13 59:1 63:20,25 65:14 77:23 82:23 84:23 85:1, 24	means 14:4 84:12	mind 48:1,4,7
maybe 15:15 18:17,23 19:7,18 20:4 21:1 41:11,12 50:2 75:20 94:2	meet 28:22	minority 14:19
Mcadam 32:4	meeting 28:12	minutes 55:3,6,11 57:3
me 6:9 7:23 9:17 11:8,12,18 13:5,25 16:4,20 19:7 20:24 22:8 29:4 33:3 36:20 37:21 38:11,12 39:6,23 40:3,4,5,10,11, 14,22,24 41:12 42:6 44:4,16 45:4 51:24 54:22 55:5 57:24 58:4,9 59:6 60:6 62:17 63:8,9,10,12, 13 64:23 66:7 67:12,13 68:1,11 70:3 72:11,25 73:3 74:5 77:5 81:12,20, 21 84:1 86:2,6 87:13,25 91:25 92:12,25 93:1 97:6,15,20 98:13	memory 79:3	misabeled 77:23
mean 14:6 15:16 16:22 20:5	men 89:22	mislead 75:24
	messages 6:18 67:4,7	miss 93:5
	met 26:5	misspoke 93:5
	Michael 38:4,18	MLU 24:24 25:1,2,5
	might 15:15 24:12 27:2 29:17 31:12 39:9 45:1 47:20 48:10 49:9 58:14,17 59:20,24 65:3 66:21,24 79:22 86:20,25 87:6	mom 12:1 17:1 22:23 23:3,14, 17 30:20 37:17,18,19 39:23 45:3 46:20 54:18 56:19 58:12 61:1 72:10 85:18 86:5,7
	Mike 34:13,18,19	money 19:25 20:14 29:24 47:13, 14 92:9 93:16
	Mill 75:9,11	month 33:19 63:2,7
	million 33:19 63:6 68:22 70:24 71:21 72:12,24 73:1,12, 13,14,15,17 80:3,15	monthly 32:25 63:21



<p>months 5:18 18:17 44:17 69:3 84:4 85:3</p> <p>more 14:20 19:22 20:2 40:24 41:23 50:9 53:17 54:4 55:10 61:2,16 72:6 73:14 92:9</p> <p>morning 4:20,22 5:10</p> <p>most 19:24</p> <p>mother 15:20 16:17 21:17,18 26:12 27:7 31:4 38:9,10, 25 39:24 40:1 41:6,9 44:5 45:8,11,17 46:3,8 47:9,10 48:5,17,23 49:20 52:16 53:2,11,12,14,25 54:23 56:1 59:12,16,17, 22 61:25 64:22 65:19 67:6 70:13,14 71:20,22 82:10,17 87:11</p> <p>mother's 12:25 24:3 48:12,18 60:4,8,15 71:13</p> <p>mouth 27:18 33:23</p> <p>move 25:10 43:7,16,18,24 44:9,13,17 75:4 85:3</p> <p>moved 39:4 43:4 75:11 84:5</p> <p>moving 97:2</p> <p>Mowbray 4:1,7,23 5:10 6:25 9:8,</p>	<p>16,18,21,22 10:6 11:5,6, 11,17 12:1,7,11 13:21,24 14:1 15:9 18:8 65:12 78:10,11 85:22 86:15 91:25 95:11,16 96:22 97:2 100:8</p> <p>Mowbray's 4:8 9:2,3 11:20,22,25 13:11 17:18 18:9,25 19:3,4,9,25 28:13,20 29:3,4 30:11 42:16 59:4, 5 65:2 66:7 69:7,14 86:16 87:19 89:13 90:20 92:5</p> <p>Mr 4:20,22 5:9 10:18 28:11 31:18 40:15,17,19,21 41:2 42:12,18 45:7 51:1, 2 53:19,23 54:8,11,25 55:2,5,8,9,13,14 57:2,4, 6,9,14,19,20 67:16,23 70:3,7 71:16 77:21 78:6 80:20,23 81:1,20,24 83:10 92:7,23,24 94:6 97:24 98:2,4,5,12,20,23 99:2,7,11,17,18,19,20 100:3,5</p> <p>Ms 5:10 91:25 95:16 97:2</p> <p>MT 59:5</p> <p>MTS 9:4,12,19,22 10:5,9,16, 19,21 11:22 12:18,25 13:11 14:1 15:9 17:7,10 29:6,16 30:21,24 31:5,15 33:14 41:19 43:7 47:1 61:12,17 67:25 68:4,6 70:4 87:20 88:15 89:2,8, 16 90:4 97:3,4</p>	<p>MTS's 29:11 35:17 38:20</p> <p>much 28:2 29:7,24 37:14 43:18 44:22 63:11 69:13 70:22 80:17 88:5 97:12 100:2</p> <p>multiple 47:3 55:1</p> <p>must 66:6</p> <p>MWP 9:9 59:5,6</p> <p>my 9:20 10:12 11:4,17 12:1 14:21 16:16,17,24 17:1 22:15 23:3,14,17 37:17 39:23,24 40:13 41:13 44:4 45:3 50:19 54:18 56:19 58:12 61:1,15 64:25 70:14 71:13,20,22 72:10 73:10 77:2,3,4 79:3 82:10 86:5,7 90:16 95:10 97:1 98:18</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>name 10:10 37:2,4 41:13,14</p> <p>named 31:14</p> <p>names 11:9</p> <p>nauseous 98:17</p> <p>Neal 34:13,18,20</p> <p>need</p>
--	--	---

40:10 58:1 63:1 64:14 97:10 100:5,6 needed 54:14 63:6,11 negotiations 97:17 nephew 9:20 net 68:16,17,21 69:23 70:5 73:21 80:11 81:9 never 29:12 42:8 46:12 52:17 65:2 66:7 new 43:7,14,24 73:13 75:5 84:5,11 85:19 next 97:1 nice 61:4 66:14 nine 44:17 no 7:8,25 8:16,19,21,24 9:1 12:13,14,16 13:2 15:18 18:3 19:1 22:19 23:8,10, 12 24:15 25:17,19 26:1, 7,10,14,18 30:18 34:5 36:15,18 42:8 48:8,9,20 49:21 51:15,19 52:15,25 54:10 56:25 58:24 59:18 62:8,11 64:1 65:10 69:15 70:24 71:2 72:21 81:5 83:18,23 84:1 85:10,21 86:2 88:10 89:3,4 92:14, 17,22 93:24 94:15 95:5	97:5,22 99:9 nobody 11:1 88:9 nor 90:15 Northern 24:22 25:6,11,12 not 7:18 8:7 9:2 12:13,15,20 13:16 14:24 15:4 17:13 23:14 32:22 33:22 34:1 36:24 44:7 48:8,9 49:2 50:23 51:7,8,9,13,23 52:11,15,18,19,24,25 53:10 56:8,19,20 58:10, 12,13 62:3,4 65:6,24,25 66:1 67:17 70:15,16,20 71:10,12,13,20 72:8,9 74:25 79:22 80:6 81:16 82:10 84:1 85:16 86:5 87:12,15 88:10 90:10,15, 22 91:4,5,18,19 92:1 93:22 94:1,13,24 96:1,2 97:14,16,17 100:6 note 11:20 nothing 5:4 now 4:5,25 11:19 16:8 21:12 26:19 28:24 32:15 33:11 34:6 37:7 38:24 39:16 48:12 51:24 52:6 53:1,11 56:16 58:19 63:8,10,13 64:13 69:9 70:1 72:14,15 75:14 76:15 78:7 82:22 86:15 87:22,24 number	4:11 33:8,24 51:17,18 87:2 99:25 numbers 67:17 nurses 46:14 nursing 8:7,9,15 46:21 <hr/> O <hr/> o'clock 99:5 oath 6:1 57:22 objection 53:19 54:5 80:20 objections 96:1 observation 47:10 observed 58:22 occasion 44:24 occasions 5:15 60:3 occur 15:2 occurred 24:18 occurring 16:21 24:19 27:24 29:1 occurs 23:2 65:17
---	---	---

October 76:3 84:12,15 90:10	95:9 96:5,9 97:3 99:9 100:8	10,16,19,23 31:21 32:3, 5,7,15,21 33:3,6,9,10,22 34:3,6,11,25 35:6,16,24 36:9,19,23 37:1,7,13,18, 25 38:5,15,24 39:8,11, 16,25 40:3,14,17 41:5, 15,18,23 42:6,13,19 43:6,9 44:19,25 45:2,5, 16 46:7,24 47:6,18,21,25 48:23 49:10,12,13,18,24, 25 50:4,5,16,23 51:1,6,7, 8,9,10,12,21,22,24 52:5, 6,12,16,19,21,25 53:1,6, 8,11 54:8,18,24 55:7,9, 10,13,21,25 57:1,3,6,9, 11,19 58:4,9,16,19 59:1, 11,19 60:1,14,18,23 61:6,11,15 62:9,13,22 63:12,16 64:8,13,19 65:4 66:2 67:3,11,12 68:16 69:16,21 70:1,19 71:24 72:14 73:25 74:5 75:4, 10,14,18,23 76:2,10,21 77:10,15 78:9,14,22 79:8,13,20 80:8,14,17 81:6 82:2 83:4,12,14,24 84:2,10,17 85:6,15 86:2, 8 87:1,13,19 88:8,11,25 89:6 90:4,15 91:7 92:15, 18,23 93:2,13,18 94:3, 13,16 95:1,3,10,25 96:19 97:12,20,23 99:11,14,15, 20
of 4:1,6,7,10 6:2,10,12,25 7:3,10,15,18 9:19,22 10:5 11:2,5,9,24 12:12, 18,25 13:7,18,21,23 14:7,10,13 15:11,17,20, 21,23 16:21,22 17:1,3,7, 8,25 18:20,24 19:5,24 20:4,10,14 21:3,4,9,13, 17,18 22:1,15,18 23:16, 21 24:11,14 25:8 26:6,9, 12,13,16,17,25 27:5,8, 10,14,23,25 28:9 29:1,2, 5,6,9,13,15 30:11,13,17, 21,25 31:5,6,17,20,21,22 32:8,18 33:2,7,8,14 34:7, 10 35:17,19 36:13,17 37:2,12,13 38:21 39:18, 21 40:24 41:21,23 43:2, 14 46:8,13,14,17,22,25 47:3,7,25 48:2,5 49:10, 19 50:7,13,20,23 51:16 52:9,12,14 53:4 54:9 55:22 56:12 57:25 59:1,8 60:6,25 61:5,8,21 62:1,7, 16 63:6,9,14,20,21,22, 23,24 64:8,9,23 66:19 67:18 68:5,6,14,16,22 69:1,11 70:17 72:16,20 73:5 74:6,8,19 75:25 76:18,21 77:11 79:4,9,17 80:3 81:9,12,22 82:6,9, 15,19,20,23 83:1,7,8,11, 21,25 84:3,21,23 85:2, 11,22 86:17,21,24 87:4, 7,16,17,18 88:15 89:18 90:1,10,11,13,20 91:9, 10,13,16 92:5,10,11,20 93:25 94:5,8,14,20,22	off 54:5 57:12 98:6 100:9 offered 52:9 82:25 offers 65:22 offhand 30:15 36:24 92:21 office 20:10 42:23 43:1,3,7 61:3 75:5,14,19 76:5 84:5,7,11 85:3 officer 9:15,22 10:2 15:8 16:6 officers 23:1 offices 43:24 oh 5:16 16:10 18:22 19:6 26:1 35:13 40:10 41:13 59:5 77:22 okay 5:19 6:12,15,24 7:2,9,13, 23 8:1,9,12,17 9:4,5,9, 11,14,17,21,25 10:5,11, 13,18,24 11:2,14,19,24 12:2,4 13:3,10,17,20,23 14:1,11 15:7,11,16 16:3, 8,14,20 17:10,16,19,24 18:2,9,19,24 19:2,8,12 20:17,25 21:12,21 22:3 23:5,8 24:3,13,16 25:20, 23 26:2,5,19 27:4,22 28:24 29:14,22,25 30:4,	old 93:25 older 11:12 on 4:5,12,17 5:15 8:18 12:21 13:7 15:7,22

<p>23:23,24 24:2,3 26:8,12 32:25 33:25 36:10 37:12, 14 39:21,23 40:8,20,21 44:9,24 47:11 48:24 53:14,16,25 54:2,20 55:2,6,11 57:18 59:2 60:3 62:20,22 64:21 65:19,20 66:4 67:6 68:21 69:6 70:2,4,5,6 73:4,22 74:1 75:8,9,12 76:9,10, 14,15,24 77:1,17,24 78:17 79:6,18,20 80:17 83:10 86:10,16 93:3,9 98:11,13 99:4,19,23</p> <p>one 5:17 11:1 16:3 20:22 21:21 22:15 24:12 34:10 36:15,17 39:4,14,22,25 41:23 42:14,17 43:23 44:12 46:17 48:16 59:8 64:8 76:10 84:24 86:2 90:16 91:20 92:19 94:24 99:22</p> <p>one-page 41:6 45:18 48:13 49:6 82:16</p> <p>ones 20:23 22:16 36:16,25 89:23</p> <p>ongoing 22:9</p> <p>only 33:3 36:15,17 90:16</p> <p>opened 75:15,19</p> <p>operate 17:20</p> <p>operating</p>	<p>21:9 34:9 73:21</p> <p>operation 19:15</p> <p>operations 20:14,18 43:13 47:12 68:22 69:23</p> <p>or 5:20 6:5 7:19 8:13,17 9:2 11:22 13:6 18:15 21:17 29:24 31:3,4,10 32:16, 21,22 33:12 34:1 36:2 38:21 39:6 40:6,11,20 41:23 44:11,14,16 45:8 46:21 47:21 48:20 50:1 51:25 52:20 53:7,15,17 54:1,3 56:22 58:17,20,23 59:20 68:3 78:15 80:7,9 86:3 88:3,14 92:12,15 94:25 96:1 97:15,18,21</p> <p>ordinary 68:17 69:24 70:5</p> <p>organize 19:18</p> <p>orient 75:23</p> <p>original 4:8 9:3 11:1</p> <p>other 7:5,17 8:14 13:10 15:13 20:5,21,23 23:1,20 24:7 31:22 32:10 34:11 35:1, 18 36:16,19 46:20 47:10 48:1 61:24 67:3 72:10 79:20 82:3 84:7 90:8 93:22 95:23</p> <p>others 31:4 34:11 36:23 44:10 82:17</p>	<p>our 6:22 29:12 31:19,20 32:2 35:7,12 50:10 52:4 59:8 60:22 62:12 63:9 64:2 71:22 74:1,21,23 75:3 91:16 97:8,18</p> <p>ours 95:9</p> <p>out 17:24 18:20,24 19:5 20:17 48:1,3,7 50:19 56:13,18 71:8 76:25 89:22 99:9,14</p> <p>over 5:22 13:12 24:10 37:24 38:1,13 50:24 77:3,12 86:20 94:5 99:25</p> <p>overhear 33:12</p> <p>overheard 56:23 58:20</p> <p>owe 83:16</p> <p>own 95:6,11</p> <p>owner 14:7,10,13,14,18,19,21 15:10 16:2 47:3 96:14 97:6</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>p.m. 77:11</p> <p>Pacific 4:13</p> <p>package</p>
---	---	---

<p>37:9</p> <p>page</p> <p>39:22,25 42:14 43:25</p> <p>48:16 70:2,4,5,6 73:4,22</p> <p>74:1 77:12 80:17 84:24</p> <p>85:24 87:2 93:3,9 99:24, 25</p> <p>pages</p> <p>86:19</p> <p>paginate</p> <p>62:25</p> <p>paid</p> <p>79:23 97:20</p> <p>paragraph</p> <p>76:24</p> <p>part</p> <p>20:4 28:7,9 50:20 60:25</p> <p>61:21 68:5 79:16 81:17</p> <p>90:1 92:20 99:22,23</p> <p>party</p> <p>5:20,21</p> <p>pass</p> <p>12:2</p> <p>passed</p> <p>13:3,12</p> <p>passing</p> <p>13:1,18,19</p> <p>past</p> <p>59:20</p> <p>pay</p> <p>20:12 32:25 90:1 92:9</p> <p>97:12</p> <p>payable</p> <p>31:24 81:3,7</p> <p>paying</p> <p>62:12</p>	<p>payments</p> <p>80:5</p> <p>payroll</p> <p>22:16 23:20 24:1,2,3</p> <p>31:25</p> <p>people</p> <p>20:10,21 21:9 23:21 36:2</p> <p>61:5 62:15 65:21 66:14</p> <p>90:13</p> <p>per</p> <p>33:19 62:1 63:2,7</p> <p>percent</p> <p>13:5 14:7,9 49:24 51:5,8,</p> <p>12,16,18,19,20,23 52:2,</p> <p>19,25 53:4,9 56:16,24</p> <p>74:15,16 80:18 81:3,6,9,</p> <p>12,22 82:6,9,15,18,20</p> <p>83:21,25 85:23</p> <p>percentage</p> <p>52:9,14 74:8,10,19</p> <p>perhaps</p> <p>44:11 84:22</p> <p>period</p> <p>20:19 30:2 46:8 51:22</p> <p>61:6 69:2</p> <p>person</p> <p>94:24</p> <p>personally</p> <p>86:6</p> <p>perspective</p> <p>69:10</p> <p>PG&E</p> <p>35:10 79:1,4,13,18,22</p> <p>80:1,2 91:10 94:21</p> <p>Phaing</p> <p>31:14 32:7 33:18 47:23</p> <p>78:15 91:15 96:11</p>	<p>Phaing's</p> <p>31:18</p> <p>Pham</p> <p>4:15</p> <p>phone</p> <p>26:8,12 64:21 65:19</p> <p>66:3,4,5</p> <p>Phyllis</p> <p>28:20 41:12 42:16 43:15</p> <p>44:1 53:3 54:16 58:23</p> <p>59:9,12,23 60:3,7,14,25</p> <p>78:10</p> <p>physically</p> <p>21:22</p> <p>pieces</p> <p>47:3</p> <p>Pino</p> <p>95:3,6,11 96:4,5,10 97:3,</p> <p>7,9,12</p> <p>place</p> <p>31:10 35:15 38:24 42:19</p> <p>44:9 89:24,25</p> <p>placing</p> <p>65:11</p> <p>plaintiff</p> <p>4:7,21</p> <p>plaintiff's</p> <p>87:1</p> <p>please</p> <p>4:17 5:2 37:2,4 48:21</p> <p>54:23 57:10 92:1 97:15</p> <p>98:14,15</p> <p>point</p> <p>14:14 15:22 26:19 30:19</p> <p>poorly</p> <p>64:16</p>
--	---	--

position 7:17 19:12,13	10:24 12:25 15:7 16:25 26:5,9,13,17 29:9 35:8 39:16 43:16,18 44:12 52:20	properly 36:14
positive 89:19		Property 9:8 59:6
posted 86:23 87:5 88:2	prison 17:21,25 18:2,20,24 19:5	provide 31:11
posting 87:11,14,18 89:1	probably 5:18 8:11 20:2 26:23 37:16 42:21 49:23 61:3,4 66:16 67:1,8 68:8 75:1 77:3	purchased 59:9
Prado 4:14		purchasing 59:2
precise 65:10	problem 79:13 80:2	purports 82:15
premiums 79:1	proceeding 5:3 100:10	purpose 34:7
preparation 32:8	proceedings 57:16 98:9	purposes 6:12 67:20
prepare 38:10	process 35:16 36:13 55:16	pursue 8:14
prepared 77:4	produced 67:19 68:4	put 27:17 46:21 53:17 54:3 58:1 69:10 76:14 79:20 81:22 86:10
presence 21:25 26:11,16 31:5 32:16 33:12 47:19 65:5	production 67:25	putting 33:22
present 58:15 59:12 60:4	profit 29:23 30:12 32:9 68:12, 16	pyramid 31:22
presented 38:25	profitability 36:6	
president 15:10,23 16:1,5 22:23 23:3 46:25 55:22	profits 52:10,14 53:4 69:14,23 70:5 73:20,21 82:19,20 83:25 93:13	<hr/> Q <hr/>
presidents 23:9	project 17:5,8,12	quarter 30:25
pretty 69:6 88:5	promise 65:1 66:7 75:24	question 19:3 29:4 33:25 50:21 61:16 65:11 73:10,13 80:24 85:19,20 87:25 88:1 93:6 95:15,18,21
prior		

96:2 97:1	real	receivable
question's	47:4	31:24
95:10	realized	receive
questioning	88:1	20:14 29:10,12
4:19	really	received
questions	21:2 29:12 35:22 39:4,20	14:18 35:8 42:3,20
85:10 90:16 97:10	42:4,5,23,24 43:20 44:2	43:15,24,25 53:4 74:14
quite	45:25 48:10,11 49:15	84:3,8,12
67:4	60:5,12 61:22 64:3 66:18	receives
quote	68:9 76:20 92:5 97:11	20:8
90:10	reason	receiving
	7:23 14:20 64:17 85:9	43:3 61:25 68:3
R	reasonable	recently
	10:1	5:24 68:5
R-O-D-I-G-U-E-Z	reasons	recollection
37:6	34:12	29:15 33:16 39:13 43:2,
raise	recall	14 45:5,16 46:3 48:2
5:1	6:15,20,21 9:23 11:22	50:7 57:25 60:6 62:9
Ramirez	15:15 16:9 17:23,24	63:5,14,23 65:15 77:11
10:7,8,10,18 11:15 12:9	23:15 25:24 28:12,18	84:23,25 85:22 86:17
Randall	29:7,8,18 30:10,14,18	87:4
11:17	31:1,3,7,8,9 32:19 33:15	reconcile
range	34:4,5 36:24 37:15,20	76:4
39:6 44:16 92:12,15	39:4 42:24 43:19,20	reconvene
97:15	45:13 46:1,4 47:25 48:8,	99:23
rants	10,11 56:3,21,25 58:17,	record
66:16,25	20,21,24,25 59:1,16,21,	4:6 57:12,18 64:10 98:6,
rather	22,25 60:5,13,14,19,20,	11,14 99:21 100:9
40:18	21 64:1,3,14,19,20,25	records
reaction	65:23,24,25 66:1,2,9,18,	65:13
48:13	19 67:24 68:3,25 69:13	recover
read	70:23 72:15,20,21,23,24	15:4
42:2 53:23 64:5,6 67:8	74:16 75:14,18,20 76:4,6	recovered
76:19 80:6 87:9,11,22,24	78:22 79:2,5 80:4,15	46:12
reading	84:6 85:25 86:6 88:18,19	Recovery
87:4	90:24	28:9
	receipts	
	63:7	



recruit 55:22	relocated 56:8	99:9,12
Redlands 32:6,11	relocates 56:6	reporting 49:19 51:25
refer 9:4,8 12:4,7,9 16:23	relocation 84:11	represent 4:18
reference 25:7	remember 15:14 25:22 26:3 27:2 28:17 29:18 33:15 39:2, 10,20,21 43:21,22 44:3, 15 60:10 64:17 79:5 84:7 85:4	reputation 27:19,25
referred 52:20 56:16	remind 64:23	required 32:18
referring 6:20 10:3 12:17 41:1 91:6	rents 63:21	requirements 32:24
refine 65:10 84:22	reopen 78:3	reschedule 98:19
refined 61:16	repeat 28:6 53:22 66:23 92:2	research 11:4
refresh 39:13 63:4,23 77:11	rephrase 29:4 73:10 81:20 93:6	residence 59:8
refreshing 79:3	replaced 88:3	respect 11:20 27:24 31:13 32:15 33:11 37:7
relabel 78:1,2	report 21:3 47:21 52:7 53:8 63:18	response 6:23 7:14 66:22
relate 32:22,23	reportable 81:16 91:19	responsibilities 31:18
related 10:11	reported 12:24 20:25 21:7,9 31:3 33:18 48:6	responsibility 22:10,14
relationship 89:10	reporter 4:15,25 5:1 28:6 50:19 53:25 67:15 71:8 77:19 81:17 91:20,24 92:19	responsible 9:14,22 36:11
relevancy 96:1		restart 73:13
relevant 95:8 96:16,25		restrictions 13:7
relocate 56:5		result 94:17

resulted 89:19 revenue 20:7 35:17,18 36:7 48:24 69:13,17 70:6 73:5 80:3, 11 90:5,11,20 91:2 92:13,16 93:2,13 revenues 30:2 63:21 89:19 review 6:24 7:2 45:7 86:23 reviewed 6:13,16 45:12,18 reviewing 68:4 revocable 13:14 Rhonda 10:7,10,24,25 11:15 12:9 Richard 11:11 12:7 78:11 Rick 6:25 11:11 12:7 16:16,25 17:3 18:24 19:4 20:17,25 21:7,10,13,25 24:18 26:16 27:4,24 28:13 31:4 33:17 34:7 36:11 37:8 39:19 42:6 53:15 54:2,10 55:16,18,25 56:17,22,23 58:9,11 60:24 61:7 64:19 65:12,18,21,25 69:10 72:15 79:2 85:18,22 86:1,3,7,9,15 87:5,13,20 88:2,16,19,21 89:9 Rick's 17:13,16,17 19:13 56:4 58:5 66:16 67:3	Ricky 9:16,18,21 10:5,13 33:7 60:24 93:25 94:5,13 Ricky's 10:21 98:25 right 5:1,22 10:21 15:19 17:3 19:1,24 21:24 27:17,22 30:23 35:2,5 38:5,7,15, 20 41:9 42:2 45:11 46:11 51:17 56:4 57:24 58:8 63:1,8,13 65:4 67:11 68:20 69:5,10 70:8 71:19 72:25 76:10,17 79:15,16 81:25 82:3,4,12,22 86:15 87:22,24 96:18 99:20 100:1,4 RMO 10:1,5,13,24,25 Robin 4:1,6,23 55:10 57:6,21, 24 73:11 74:3,13 78:10 95:11 96:22 98:12,21 100:8 Rocklin 25:21 Rodriguez 20:23 37:6 Roger 10:8 role 22:8 32:16 72:17 Ronnie 4:8,21 16:1,4,5,8,22,23 17:7,11 21:14 22:1,4 23:2 24:20 25:7 26:5,13, 17,20,22 27:5,8,10 28:12,19 29:1 33:17 34:8	39:18 41:11 42:16 43:15 44:1 50:14,25 51:25 52:3 53:3,8 54:16 55:18,19 56:1,2,5,6 58:6,10,21,23 59:9,12,22,23 60:3,7,14, 24 64:15,21 65:1,18,19, 22 66:3,4,6,25 68:20 69:6 72:16 75:18 76:2,24 77:12 78:10 80:17 81:3,7 82:22 83:4,9,10,16,21 84:10 85:11,23 88:9,14 89:7,15,18 90:5,9,16 Ronnie's 27:25 36:10 37:8,11 61:7 76:8 86:16 89:5 Roseville 25:21,23 roughly 68:22 82:4 84:4,15 routinely 29:9 run 62:6 99:14 <hr/> <p style="text-align: center;">S</p> <hr/> Sacramento 25:16,17 35:14 36:22 safe 36:3 safety 41:21 said 16:24 17:16 27:14 28:2 29:3 31:9,10 39:22,23 44:15 45:13,14,19 48:8 49:8,9,20,21 50:5,8,10, 17 51:16 52:4,22 53:7
---	---	--



56:18 61:20 62:3,15 63:9 64:1,4,18,23 65:3,8 66:10,18,20,21,22,24 68:9 70:4,16 71:10,12, 19,20 72:8,10 74:23 75:3,16 76:6 77:2,4,6 80:6 81:13,19,25 82:10 84:6 85:4 87:16,20 89:22 90:24 91:5,14 94:18 96:16,24	saying 21:6 44:19 50:6 65:1,6 66:19 78:24 81:9 82:20 89:4 90:15 92:3 says 40:23 63:1 66:6 68:13,17 71:25 74:2 76:18 77:10 78:17 80:16 93:3 SC 77:7 schedule 20:12 school 8:2,3,6,7,10,15 screen 40:22 62:20,22 67:13 76:14,15 77:17 79:21 86:10 searching 49:20 season 60:8 second 50:20 55:2 76:9 77:24 91:20 92:1,19 secretary 22:17,20 23:4 96:5,10 see 19:7 34:18 40:3,4,24,25 41:3 42:23 43:1 44:11 58:2 62:20,23 63:2,11,19 64:10 66:10,11,17 68:1, 8,14,18,22 69:19 70:13, 18 71:25 76:7,15,23 77:17 78:7,12,20 84:19, 22 86:13 89:9 92:25 93:1,2,6,11,12 95:13,25	96:12,16,23,24,25 seeing 43:19 63:8 89:10 seem 80:1,2 seen 30:7,8 44:13 67:11 selling 35:3 send 40:12,13,14,15 42:12 67:9 sending 40:18 sense 69:5 sent 45:1 77:12 85:12 separate 42:13 September 77:10 83:10 serious 14:24 service 4:9 8:23 9:3 11:20 19:9 24:1 35:3 53:18 54:4 95:4,6,12 96:4,6,9 97:7 set 99:2 seven 55:3 shall 34:19 67:4 share
sales 93:3,6 same 6:2 18:14 40:15 45:8,9 46:24 67:20 91:21 San 4:10 25:18 75:7,12 savvy 47:10 48:23 saw 39:17 56:16 84:23 say 5:18 6:19 15:16 18:22,23 19:7,21,23,24 20:5,21,23 21:1,5,7,12 22:3,13 23:20 25:11 26:4,25 27:13,18 28:25 30:23 31:8 32:16 33:12 34:19 36:10,15,16 37:13 43:1 44:2,9,21 45:11,22 47:6, 15,21 49:5 50:5 51:4,7, 20 53:12 54:12,13,22 55:16,17 59:4 60:18,23 61:8,11,17,24 62:4,5,7, 11 66:2,11,14,15 67:4 71:4 73:10 75:17 84:4 88:25 89:3,6,13,21 90:2, 8,13,23 92:8 94:23		

40:20,21,22 67:13	should	signs
shareholder	7:13 70:4	83:9
12:25 15:20 30:20 72:4	shouldn't	simply
74:6,7,9,11,15,16,18	88:2	5:20 33:25
94:16	show	simultaneously
shareholders	29:23 30:2,5 40:10,25	81:16 91:19
11:24	62:17 67:12 69:16,17	since
shares	70:8 76:11 77:15,16	5:24 8:2 82:23
12:21 13:4,17	92:25 96:4,19	single
she	showed	14:7,12 70:17
10:11,13,16 11:1 12:13,	69:1 72:25	sir
20,21 13:3,14 14:18,21	showing	65:7 68:7 87:22 89:21
15:11,23 16:2 18:12,16,	63:8,10 73:3 77:13	94:9,18 97:5
21 23:18,21 24:7 26:12	shown	sister
27:9 34:15 45:4,12,13,	70:6	10:12
14,18,19,22 46:1,9,10,	shows	situation
11,13,20,22 47:3,11,13,	64:8 68:13,16 96:22	62:13
14,16,18,21,22,24 48:9	sic	six
49:2,3,5,6,7,8,9,10,12,	10:8 37:6 70:11	44:16,17 84:4 85:3
13,15,16,21,23 50:3,5,7,	sick	six-page
9,14,22,23 51:4,6,9,10,	40:8 98:16	62:23
12,16,17,18,19,20,21,22	sign	slow
52:5,7,8,19,20,21,22,24,	23:21 24:7,13 37:17,18,	79:6 92:2
25 53:15,16,18 54:1,3,4,	19,22 38:10,12 39:1,24	small
13,14 58:13,14 59:14,18	40:1 41:7,10,25 44:5	96:15
62:7 65:3,5 66:5,10,11,	54:14,19,23 59:13,14	smaller
15,16,17,20,22,24 67:1,	signature	68:2
7,8,10	23:23,24,25 24:4,10	smoke
she's	42:15 54:21 76:22,25	45:17
10:12 11:15 46:24 47:6	77:2	SMUD
54:13	signatures	35:14
sheet	42:17	so
30:5,16	signed	5:22 9:11 10:13,24 12:17
sheets	23:16,18 39:12,15,17	13:10 14:13,18,22 15:7,
32:9 68:5	50:14 76:24 77:12 83:6,	19 16:3,10,16,19,20
short	7,9,12,16,20	
55:4 57:15 98:8		

17:1,3,16 18:22 19:6,11 20:17,23 21:5,24 22:20 23:8 24:3,6,15,16 25:22, 23 27:21 28:15,25 29:14, 25 30:10,14 31:2 32:7,19 33:1,2 34:3,6,8,15,16,18 35:12,14 36:1,9 38:5 40:3,7,8,9,10 41:14,15, 23 42:13,19 43:12 44:19, 22 45:5,16 46:20 50:14 51:3,10,12,24 52:6 53:1, 8 54:13 55:15,25 56:3,4 57:9 58:19 59:6,14 61:3 62:6,22 64:8,13 65:8,25 67:3,9,12,19 68:9,20 69:5,7,17,21 70:9,16 72:13 75:16 76:1,2,17,21 77:6 78:14 79:1,13,16 81:13 82:11,12,24 83:3, 4,12,14 84:2,10,21 85:14 88:13 89:11 91:7,8 92:9 93:13,18,25 94:5,23 96:3,15 97:17,20 98:12, 15 99:11,21,22 100:1,2	someone 31:9 53:17 54:3 99:13 someone's 35:1 40:3 51:7 something 13:14 17:4 30:1,4 31:9, 10 48:3 49:3 52:21 53:15,16 54:1,2 59:20 65:20 66:20,21,22 70:8 88:23 98:13 sometime 19:10 26:23 72:17 85:12 sometimes 40:23 48:3 somewhere 84:14 son-in-law 41:12,15 Soren 32:4 sorry 10:10 11:12,16 16:10 17:22 18:23 19:3 24:25 25:15,22 27:3 28:6 29:3 30:14 32:19 33:1,5 34:3 39:10 40:7,9 41:14 42:25 43:12 44:3,15 50:19 58:24 64:5 65:8 66:1 67:15 68:10 71:8 73:9 77:23 91:20,24,25 92:19 93:5 98:15 100:7 sort 35:19 87:16 sound 27:1 sounds 57:4 98:4	speak 26:11,15 28:16 88:14 speaking 57:25 81:16 91:19 specific 50:6 52:18 specifically 36:17 49:5 51:4 specifics 31:11 49:13 51:3 59:25 60:20,21 66:18 speculating 6:5 speculation 6:9 53:20 80:20,24 Spell 37:5 spelling 37:1 spend 47:13,14 spoke 21:13 26:16 52:22 58:12 spoken 26:8 52:3,4 58:14 stand 48:1,3,7 99:4 started 14:21 75:24 starting 19:13 state 4:18 96:5 98:14 statement 6:25 7:6 30:1
software 24:5 sole 13:20 14:10,13,14 15:20 30:20 96:23 solemnly 5:2 some 6:17 14:18 22:12,13 24:4 26:19 34:16 35:13 38:21 46:1,4 49:10 50:23 67:11,17,18 76:22 78:24 86:21 90:7 somebody 88:3		

statements 29:10,16,19 31:25 32:9, 12 80:9,10	80:14	6:2 7:17 21:17 28:24 29:13 33:1 45:16 46:16, 22 55:6 57:2 63:9 87:20
status 15:8 79:4	substantively 7:14	taken 4:7 5:13 8:17 57:15 98:8
stay 99:7,13,16	successful 46:25	takes 90:19 94:5
step 72:18 75:19 76:3	such 52:17	taking 46:13
Stephen 4:22 38:4,17 40:17 57:3 77:7,8 98:23 99:15	sum 35:22	talk 45:14,19 49:11,16 56:17 58:5,10,19 71:22 72:9 74:23 75:3,4 86:3 91:15
stepping 90:10	summoned 88:6	talked 34:20 48:10,25 50:12 86:2,5
steps 90:25	Superior 4:9	talking 16:17 40:5 44:10 55:18, 19 65:7 71:17 86:6 90:17 91:21 96:17
still 10:8 35:9 57:21 95:1 97:17	support 20:11	talks 63:19,20
stock 12:12,14,15,17 15:21 97:13	supposed 52:1	tax 74:2,3,13
street 75:8,9,11	sure 9:6,24 13:16 17:13 22:12 40:13 47:24 49:23 52:11, 18,20,24 53:10 55:5 56:19,20 58:12,13,14 59:25 61:2 62:3 66:10 67:10 70:15 71:13 76:9 81:5 86:5 87:12,15 89:17 91:4 94:1 97:14 99:1,6	taxes 71:11
strong 46:10 53:12	swear 4:25 5:2	team 11:4 90:18
strong-willed 48:18	sworn 6:25 7:6	technical 50:18
subchapter 14:2	system 24:5	tell 16:20 22:8 33:3 39:11 40:11 42:6 44:5 49:3 51:24 57:24 58:4,9 60:6 61:20 62:13,14 63:13 64:2 65:13 70:20,24 71:3,6 74:5 76:2 77:5
subcontractor 95:9		
subject 55:6,11		
substantial		

81:18 84:11 86:2 87:13 92:12,14,15,17,21,22 96:1 97:6,20 telling 7:18,19 ten 11:12 49:24 51:5,8,12, 16,18,19,23 52:1,19,25 53:4,9 56:16,23 57:2 80:18 81:3,6,9,12,22 82:6,9,15,18,20 83:20,25 85:23 ten-minute 98:1 tendered 85:12 tendering 41:24 term 88:23,24 termed 20:1 terms 32:18 45:23 testified 33:21 testimony 5:2,23 6:9,10 7:3,24 12:20 30:21 85:21 98:18 text 6:17 66:25 67:3,6 than 7:5 11:12 14:20 40:18 51:18 61:12,18 73:14 95:23 thank	4:24 5:12 11:19 12:11 37:7 44:22 55:13 57:4,8, 14 98:5,20,22 100:2,3,4, 7 Thanksgiving 60:9 that 5:2,19 6:6,9,22 7:2,9,13, 14,17 9:4,5,8,9,12 11:19, 20 12:22,24 13:11 14:4, 17,18,20,25 15:5,14,16, 22,24,25 16:6,9,15,18,24 17:9,10,19 19:13,16,17, 21,24 20:2,7,12,19 21:6, 7,12,14,17,18,21,22 22:5,7 23:6,7,11,25 24:5, 18,23 25:24 26:20,22 27:1,13 28:3,6,15,24 29:3,13 30:18,19,24 31:8,14,21 32:1,3,12,17 33:2,16,17,20,24 34:8, 10,13,14,17 35:8,13 36:2,3,10,11,12,17,24 37:23,25 38:6,9,13,25 39:3,11,12,13,14,16,17, 18 40:14,17 41:3,5,6,10, 11,16 43:2,16 44:8,9,12 45:3,5,9,14,17,18,19,23, 25 47:14,22 48:5,8,13,17 49:6,9,18,19,21,22 50:1, 3,10,22 51:6,9,11,13,21 52:3,7,9,11,12,13,14,16, 19,20,21,23,24 53:3,5,8, 22 54:7,10,12,14,18 55:9,10,17,21 56:12,19, 22 57:4,6 58:1,2,6,20,22 59:8,11,13,14 60:7,11, 12,19,23 61:1,2,4,13,17, 21,24 62:3,5,7,12,15,16 63:2,4,5,6,11,14,19,23 64:8,11 65:1,3,13,17,23,	24,25 66:1,6,7,8,9,10,12, 14,15,16,17,18,19,22,23, 25 67:1,2,8,19 68:4,9,14, 18,23 69:1,2,16,19 70:13,14,15,18,20,22,25 71:3,4,6,11,19,21,23,24, 25 72:1,3,6,7,9,11,13 74:22,24 75:14,20,21 76:2,3,23,25 77:8,11,13, 14,17,21,23 78:12,16,17, 20,24 79:4,5,18,21,22 80:15,24 81:7,12,17,23 82:8,9,11,16,17,18,25 83:24 84:3,12,25 85:8, 13,21,23 86:9 87:16,18, 20 88:2,4,6,14,23,24 89:1,3,5,6,10,13,15,18, 21,23 90:3,6,12,14,16, 22,23,24 91:1,2,11,13, 14,16 92:4,6,10 93:11, 12,19 94:1,6,8,9,14,17, 23,25 95:7,13,18,20,23 96:12,17,23,24,25 97:8 98:2,20,24 99:8,15,18, 19,21 100:1 that's 10:2 17:24 23:6 25:23 33:6,20 40:19 41:15 45:4 46:16 49:10,16 50:23 52:22 54:14 55:7,8,12 56:9 63:11 64:13,17 70:2,4 73:3,24 74:21 77:2 79:15 80:13,16 83:12 84:21 85:12 88:11 93:9 95:7 99:14 the 4:5,6,7,8,9,10,14,15,17, 19,23,24,25 5:1,2,4,5,6, 17,22 6:1,2,8,23,24 7:9, 10,15,17,18,19 8:22 9:3, 14,19,21,23,24,25 10:1,
--	--	--



5,10,13 11:1,5,8,9,20,22,
24,25 12:17 13:12,17,18,
20,21,23 14:1,7,13,14,
17,21 15:2,10,11,17,19,
20,21,23 16:1,2,5,10,18,
22 17:2,4,8,10,11,23
18:4,14 19:15,22,23
20:1,6,7,10,12,14,17,18
21:5,8,9,13,24 22:1,8,16,
18 23:1,3,4,16,18,25
24:1,4,5,10 25:14,24
26:8,11,12,16 27:2,5,7,
10,14,16,18,19,25 28:3,
6,8,17,25 29:2,4,5 30:2,
11,12,16,20,25 31:5,21,
22,23,25 32:1,3,7,10,11,
23,24 33:13,17 34:7,8,
11,17,23,25 35:2,16,17,
19,23 36:10,12,15,17,19,
25 37:1,8,16 38:6,15,20,
21,24 39:2,3,5,11,17,21
40:15,20,21,23,24,25
41:5,18 42:14,19,24
43:3,6,13,18,20,21,23,
24,25 44:2,5,7,9,15,17,
23 45:8,9,12,17,23
46:13,17,24,25 47:11
48:5,13,16,24 49:10,12,
14,24 50:1,2,7,13,19,20,
22,23 51:3,5,8,16,17,18,
23 52:1,13,18,25 53:7,9,
18,22,25 54:4,5,6,9,13,
15,20 55:1,7,12,16,23
56:9,13,23 57:8,11,12,
16,17,18 59:14,25 60:7,
8,11,13,20,21,25 61:3,6,
7,24 62:1,10,13,14
63:19,24 64:9,13,14,15,
17,21 65:10,13,19 66:4,
5,18,21,25 67:15,20,25
68:12 69:1,2,3,5,6,17,23
70:1,5 71:8,9,10,12 72:4,

12,15,16,17,21 73:5,10,
17,20,21 74:1,8,12,14,
19,24 75:1,4,5,19 76:5,7,
9,10,14,15,21 77:6,17,
19,24 78:24,25 79:4,16,
17,21,25 80:2,3,9,10,11,
22,23 81:9,17,18,21
82:9,18,19,25 83:6,7,8
84:2,3,5,6,7,10,11,23,24,
25 85:3,4,9,17,19,23
86:9,10,23,24 87:5,23
88:22 89:14,18,22,23
90:16,18 91:5,11,12,20,
21,22,24 92:3,13,16,19,
20,21 93:6,19,23 94:5,7,
21 95:15 96:5,10,11,14,
22 97:2,6 98:6,9,10,11,
13,14,15,22,24 99:1,6,9,
12,21,23,24,25 100:2,5,
6,7,8,9

their

11:9,16 20:11 41:12 48:4
59:10

them

20:13 23:23,24 29:12,17
34:10 35:11 37:22 38:12
47:25 48:1 67:9 99:13

then

11:15,17,18 17:11 20:25
32:2 35:22 45:3 50:2,12
55:6 63:10 64:3 73:4
75:21 76:25 90:25 94:10

then-ceo

34:17

there

7:23 14:20 15:13,14
18:21 19:6 20:23 23:8,13
25:10 31:14 34:15,16
36:16,21 49:20 50:3
59:18 60:19 70:24 71:9

75:21 79:13,21 82:23
83:14,19 88:23 89:6,15,
22 90:8,22 91:13 92:4,10
96:18 100:1

there's

9:7 16:3 53:9 65:20
68:21 70:17 71:11,24
72:7,10 76:22 77:7 85:10
90:11 91:10 92:5 94:8,
10,21,23

these

22:9 24:17 33:8 41:23
64:5,6 67:18 68:10 80:6
85:10 86:21

they

17:1 18:14 21:3 26:3
29:18,22 32:5 35:18,21
37:21 38:11,20 39:22,23,
25 44:4 46:2,5 48:10
50:12,25 52:23 54:14,15,
17,22 59:24,25 60:11,17,
19,22 61:4,12 66:13,14
74:8 76:5 79:8 89:10
91:23 99:12 100:1

they're

21:4 29:23 51:8 75:22
95:8 96:15

thing

46:16

things

33:8 48:3 49:10 50:3,23
61:8,11 78:18 91:11,13,
16 92:6,10

think

6:17 14:20 15:25 16:1,
11,15 17:9,21 18:17,21
19:18 20:3 22:15 23:3
24:12,15 25:9 27:9 28:4,
8 34:14 35:10,12,13

36:21 39:9 42:22 49:23 50:1,3,5,9 51:10,17,18, 19,21 52:3,23 53:5 54:6, 9 55:4 62:23 66:16 70:14 71:21 74:7,8,9,10,11,18, 21,25 75:17 76:1 79:7 81:15 83:12 88:5,9 89:4, 10 95:7,22 97:8,10,16,25	three 5:16 15:15 18:21 86:19	11,12,23,24 34:6,7,8 35:3 36:10 37:7,16,18, 19,21,22,23,25 38:9,10, 11,12,13,17,25 39:4,16, 19,23 40:1,5,10,12,13, 15,24 41:1,7,9,11,24,25 42:4,7,9,13 43:13,16,18 44:4,5,8,10,12,16,17,23 45:1,4,6,8,14,19 46:16, 22 47:6,14,21 48:6,12, 13,20 49:10,11,16,17,19, 22 50:7,13,24,25 51:3,9, 12,13 52:3,6,7,17,21,22, 23 53:2,8,9,12,15,16,18 54:1,2,3,4,6,10,14,18,22 55:15,18,19,22 56:5,17 58:2,4,10,12 59:9,11,13, 14,15 60:2,4,7,23 61:3,8, 11,16,24 62:6,11,13 63:1,2,7,12,13 64:5,6,10, 14,21 65:1,21,22,25 66:2,4,5,6 67:4,13,14,16, 18,19 68:1 69:9,10,16,18 70:8,10,13,14 71:11,14, 19,21,22,23 72:4,8,9,10, 12,14,18 73:4,10 74:2,3, 12,20,23 75:1,2,3,11,18, 23 76:3,9,11,14,20,21,23 77:7,12,15,16 78:1,2,10, 16,24 80:1,2,6,13 81:3,4, 7,8,21 82:15 83:1,10,16, 21 84:4,13,18,22 85:1 86:3,5,7,8,15,24 87:5,8, 10,22,24 88:6,10,13,14, 15,25 89:5,6,7,13,16 90:3,14,20,21 91:2,6,7,8, 11,15,16 92:4,8,9 93:1,2, 18,19,22,23 94:1,13,25 95:8,13,15 96:2,3,4,16, 19 97:1,10,18 98:17,18 99:5,7,13,14,16,21,25
thinking 42:22 75:20	through 18:19 24:1,4 33:8 40:18 63:20 68:12 69:3 87:2 90:9 95:3	
this 4:6 5:3 14:14,21 16:16, 21 22:6 23:2 27:23 28:25 39:4 40:8,9,25 41:24 42:6,9,12,14,20 43:3,15, 19 44:13 45:6 46:8 48:9 49:6 52:18 53:2 54:14, 18,23 55:6,11,15 56:16, 17,21 57:24 59:5 62:22 63:5,8 64:2,8,10 65:8,11, 17 67:13,14 68:5,8,11 69:10,11 70:9,10 71:12, 13,19,21 72:12 74:12,24 75:1 76:7,9,10,17,19,22, 23 77:4,7,13,16 78:1,2,3, 14,16,23 79:1,2,17 81:22 82:12,16 83:6,7 84:4,9, 12,17,18 85:12 86:4,6,7, 9,17,20,21 87:1,4,11,13, 20 88:2,5,13,15,19,20,25 89:1 90:2 92:11,22 93:3 94:18,24 95:8,13 96:2,5, 16,22,25 97:12 98:16 99:22 100:7	time 4:13 6:2 7:15,18 11:25 13:18 15:14,16,17 17:8, 23 18:4,14 20:19 22:8 23:2,7 29:3 32:3 33:17 34:17,23 35:13 36:10 39:2 40:16 43:18 45:9,25 46:8,24 48:9 56:21 57:17 60:11 61:6,7,13 72:21 75:21 77:14 79:4 82:9 85:17 86:23 87:5,23 91:14,21 92:6 94:9 98:10	
	times 37:21 38:11 55:1 60:11	
	timing 28:25 77:6	
	tip 31:21	
	title 19:16 22:21,23	
	to 5:3,22 6:4,20,23 7:11 8:1,7,9,11 9:4,8 10:3,11, 24 11:20 12:4,7,9,17,21, 24,25 13:5,6 15:7 16:17, 19,20,23 17:2,21 18:7, 22,25 19:2,4,21,24,25 20:2,5,11,12,19,25 21:3, 7,9,21 22:4 23:8 24:1 25:7,9 26:4,5,9,13,17 27:1,17,24 28:12,15,24 29:9,14,23 31:3,4,13 32:15,16,22,23,25 33:8,	

today 5:23 6:5,13 7:3,24 10:16, 19,22 11:10 15:5 38:17 95:1	tree 4:8 8:22 9:3 11:20 17:18 18:10 19:9 35:3 36:12 95:3,6,12 96:4,6,9 97:7	U
together 21:24,25 34:19 35:20	trees 20:7 35:21 36:3,12	uh-huh 10:15 20:25 25:3 29:25 48:19 69:22 70:12 82:14 87:3
told 16:4 36:19 48:17	trial 6:2 7:15,18	um 22:12 25:9 27:6,9,15 45:25 47:20 48:8 49:8,23 51:6 53:13 61:1,10 65:3 69:8 78:23 79:5 86:18 89:17
TOMTS 70:4	trim 35:21	unable 95:15
too 17:1 20:21 90:8	trimming 20:6 36:2	uncomfortable 95:20
took 6:1 21:18 31:20 62:16	True 91:8	under 57:21 59:14
total 63:20 68:13 69:13,17,18 70:9 73:5 93:3,6	trust 13:6,8,9,12,15,17,21,24	understand 6:1,4,6,8 7:9,13,21 8:1 9:12 10:2 11:4 14:4,17, 23 15:4,22 21:16 30:21 33:23 44:8 46:13 49:18 55:15,21 56:6,8 57:21 70:18 72:3 74:22 82:16
tough 46:10,20	trustee 13:12,18,20	understanding 24:17,19 25:12 27:23,25 29:2,5 51:14 81:2
town 99:9	truth 5:4,5 7:18,19	understood 24:18 53:2,3 55:18
trail 98:24	try 40:22 53:16 54:3 99:7	unfair 63:12
training 8:18,22	trying 44:8 55:22 67:17 68:1 71:14	unfortunate 93:19
transcript 7:11 100:5	two 36:19 42:17 74:12 77:19, 22 99:23	Unfortunately 62:24
transfer 12:11,20 13:4,7	type 13:7 46:8 72:20 92:11 96:9	
transfers 72:4	typed 38:6 84:2	
transmitted 83:10	typewritten 42:15 43:25 48:16 84:24 85:24	
treasurer 23:13		

unintelligible 28:5 71:7 91:23 92:17	versa 7:20	wanted 22:3 45:4 50:24 65:25
unit 35:21	version 84:2	wants 65:21 66:5
until 17:21 19:9 37:12,14 39:12 61:7 90:10	versus 4:8 63:21	was 5:17,18,21 6:17 10:5,7, 10,13,25 11:1,21,22,23, 25 14:14,17,20,21,23 15:11,23,25 16:1,2,4,11, 14,15,16,18 17:11,17,18, 22 18:1,4,7,9,12,17,21 19:6,8,12,15,16,22 20:2, 22,23 22:16,23 23:3,4,8, 13,23,25 24:12,20,21,23 25:4,6,9,13,16,17,21 26:12,23 27:4,7,9,15 28:9 29:2,6 30:12,15,17, 18,24 31:5,17,19,21,23 32:4,22 33:13,18,20 34:7,10,13,15,17,20,25 36:9,15,16,17,20,21 37:15,16,19 39:7,10,14, 17,18,21,22,25 41:7,9, 18,21 42:10,21,22 43:8 44:3,6,14 45:3 46:9,10, 11,12,13,20,22 47:3,9, 10,11 49:13 50:1,3,22 51:9,12,15,17,18,19,22 52:3,4,19,24 53:3 55:19, 25 56:1 57:15 58:9 59:14 60:8 61:3,17,25 62:7,18 63:24 64:15,19,23 65:5, 8,9,13 67:6,8,10,21 68:7 69:18,21,24 70:14,15,20, 22,24 71:1,2,19,21 72:20,22,24 73:1,8,9,13, 14,15,17,22 74:9,11 75:10,12,17,18,21 76:3, 12 77:12,24 78:4,22 79:4,6,13,17,21 80:11,17 82:9,10,19 83:7,12,14,
up 31:25 36:10 38:6 58:1 74:12 88:6	very 9:11 14:24 16:18 21:16 22:5 28:2 46:10 77:21 90:1 91:22 94:19 96:15	
upon 7:15	via 4:11	
us 17:2 38:17 48:17 49:19 62:16 88:7,10 92:5 99:12	vice 7:20 23:9	
use 9:25	video 4:5,6 57:18 98:11 99:4 100:6	
used 50:7	videoconference 4:12	
using 51:12	videographer 4:5,14,24 57:12,17 98:6, 10 100:7	
utilities 35:3 36:14	visit 18:2	
utility 90:19	visiting 59:22	
<hr/> V <hr/>	<hr/> W <hr/>	
various 24:7 60:15	want 18:22 19:21 26:4 27:17 28:24 29:14 33:8,23,24 48:12 55:15 58:4 65:21 70:8 75:23 76:9,21 77:16 81:21 84:18,22 86:8 98:17 99:13	
vehicles 49:14 50:2		
Velasquez 36:22		
verification 88:14		



19,24 84:11 85:1,7 86:11,21,23 88:11,13,14, 20,23 89:4,7,10,11,15 90:1,2,8,16,23 91:12,13, 15 92:4,10,13,16 93:2, 10,25 96:7,20 97:9 98:8 wasn't 34:15 35:23 37:12,13 49:9,12,23 50:3 51:6,10, 21 52:5,21,25 58:15 61:21 62:14 67:7 71:11 74:7 81:5 Waterman 9:8 59:6 way 40:19 49:21 61:1 we 4:5,15 6:22 17:14,15 29:8 32:2 33:6 34:13,16, 19 35:7,8,9,10,13,14,22 39:3,4 42:23 44:9,19 59:8,20 61:2,13,19,22 62:5,12,15 63:1,11 64:7, 17 67:4 68:25 70:1 71:17 73:4,25 75:17 76:25 79:25 80:4,8 82:12 83:8, 15,19 84:2,7,17 90:15 91:7,9,11,22 92:9 94:20, 21 97:8 98:13,18,21,24 99:13 100:1 we'd 20:21 we'll 9:3 16:23 42:13 44:10,11 55:6 78:16 99:3,7,11,12, 22 we're 57:18 67:16 71:14 83:16 96:17 98:11 99:21	we've 89:23,24 94:19,20 web 4:11 Wednesday 77:10 weekend 40:8 86:21 98:16 welcome 100:3 well 16:15 21:6 23:24 28:22 33:6,22 34:13 40:10,14, 23 42:7 43:11 44:2 46:11 51:7 54:20,22 61:9,15 63:8 65:4 67:7 69:17 70:22 71:6,17,24 74:12 75:23 77:5 81:15,25 83:8 85:18 87:25 89:13 91:9 92:25 94:18 97:1 98:21 well-known 16:18 went 8:7 17:21 18:16,18 19:2, 4 56:13 59:13,18 75:1 77:3 98:13 were 5:19 7:19 11:24 12:25 13:17 15:13 17:7 21:3 22:16,18,20 23:1 24:19 26:15 27:10 29:18 32:3, 24 34:11,16 35:9 36:25 38:3,16,20 39:3 41:5,24 42:23 43:2,3 46:2,5 47:12 55:21 60:4,12,19, 22 61:4,8,11,13,15,19, 22,23 62:5,10,12 64:20 65:4 66:14 67:19 68:4	69:23 70:2,10 71:17 72:12 74:2,5 76:5 78:18 80:4,14 81:25 84:7 93:7 98:12 what 6:15,19,21,22 8:1,9 10:2 11:2 14:4,6,9 15:8 16:21 17:17 19:12,17,25 20:5 22:3,13 25:11,24 27:22, 24 29:2,5,18,19,22 30:10,12,15,16,18 31:5, 17 32:5,23 33:4,13,20, 23,25 34:4,6,11 37:15 39:17,21 42:23 43:1 44:5 45:4,11,13 46:2,5,8 47:11,12 49:20 50:8 51:4,8,9,13,15,24 52:24 53:1 54:17 55:17 56:18 58:19 60:11 62:9 64:23 65:5,24 69:21 70:1 71:14 72:20,22,25 73:3,24 75:8,17 76:4 78:22 79:4, 6,17 80:13,16 81:3,7,12 82:15 83:24 84:21 88:11 90:25 91:1,2,3,4,5 92:3, 12,16 94:1 95:7,8,13,20 what's 27:22 32:17 48:23 59:7 83:7 when 5:17 6:19 7:9 8:2 9:21 12:2 13:3 15:2,16,25 16:4,8,9,20 17:24 18:19 19:2,4 22:13 25:11 26:16,22,23 27:18 28:12 30:10 31:8 34:17 37:16, 18 42:2 43:1,3,6 44:4 45:12 47:13,16 50:5,12 51:7 55:3 56:16 57:24 59:4 60:4,18,22 61:7
--	--	--

75:14 77:12 83:8,12 84:8,23 85:7 86:21 88:2 97:25	whom 4:18	withdrawn 88:3
whenever 43:11,13	why 14:21 16:14 22:3 27:12 49:10,16 50:23 54:12,14 55:17 58:9,10 64:17 66:11 86:2,3 87:13 97:6	without 6:5 81:6
where 24:16,19 25:4 26:15 40:5 44:3 50:25 56:8 64:20 66:3,5 71:14 75:10,21 91:23 100:1	wife 28:20	witness 4:25 5:6,20 28:8 40:23 50:22 53:22 54:6,9 55:1, 7,12 57:8,11 71:10 80:22 81:18,21 91:22 92:3,21 98:15,22 99:1,6 100:2
Where's 75:5	will 4:25 5:4 10:2 33:7 36:6 48:3 78:1 96:1 98:2 99:8, 9,18,22 100:6	witnesses 48:2
whereupon 42:10 57:15 62:18 67:21 76:12 78:4 86:11 96:7,20 98:8	with 4:19 7:5,6 9:4,9 11:19 16:17,25 17:4 19:22 21:13,18,25 24:18 26:8, 11,12,15,17 27:9,23 28:20 29:25 30:4 31:13, 25 32:10,15 33:11,20 34:19,21 35:11,16,19 36:14 37:7,8 38:5,17 40:17 42:15 45:17 46:1,4 47:17,19,22 48:6,25 49:2,7,10,12,13,16,24 50:4,10,23,24,25 51:6,7, 8,9,10,16,21,23,25 52:1, 4,5,19,21,25 54:5,18 55:7,9,10 56:1,2,4,17,22, 23 57:3,6,25 58:5,6,14 59:12,23 64:21 65:19 66:4 70:5 72:11 75:16 76:4,10 77:3 79:13,18 80:2 82:10,17,18 84:1,14 85:22 86:1 87:7,20 88:9, 10 90:9,19 94:17 95:13 99:15,21	women's 14:19
whether 9:2 32:22 97:20		won't 75:24
which 13:12 20:7 24:23 30:1,5 32:8 38:3 42:19 50:13 53:18 54:4 68:12 72:15 73:8,9,12,14,22 74:1 76:8 80:9,10 82:13 99:2		word 10:1 53:14 54:1
while 22:7 25:4 26:12 27:15		words 7:17 13:10 20:5 23:20 27:17 31:22 33:23 35:1, 18 46:20 47:10 48:1 50:7 61:24 67:3 79:20 82:3 93:22
who 9:14,17,25 10:5,24 11:8, 24 13:23 16:23 18:7 20:10,25 21:8 23:1,16 24:10 31:23 32:3 33:7 34:20,25 36:9 38:17 41:9 52:8 90:18 93:25 99:13		work 17:10 18:25 19:3,4,19 28:13 31:15 32:10 35:9 79:1,5,22 80:1 88:6,10, 15 89:7,10,16,23 99:18
who's 20:18 54:15 90:17		worked 16:25
whole 5:4 98:16	withdraw 80:23 85:19	workers 35:17
		working 18:9 24:21 25:4 41:18 75:22 90:9

works

52:12,13 99:19

worst

91:12

would

4:17 19:7,18,25 21:2,5
 23:21 24:4,7 27:13
 29:12,13 30:1,5 31:23
 32:2,7,8 33:20 34:14
 37:23,25 38:12,13 44:4
 46:7 47:14,16 49:2,3
 52:16 53:11,14,16,25
 54:2,10,22 58:10 63:12
 65:1 66:25 67:9 72:11
 74:15 77:22 79:21 80:18,
 19,24 81:3,7 82:18
 83:21,25 87:8,17,22,24
 88:3,25 89:6,13,21 90:7,
 8,13 98:14,24

wouldn't

36:15,16 46:21 62:4,5,7
 77:21 89:3 90:2,23,24

writing

88:4

wrote

59:5

Y**yeah**

6:18 13:8 14:12 15:25
 17:1,14 19:21,22 20:5
 21:11 22:7,12 23:6 27:6,
 9,11,15 28:18 29:8 31:7,
 12 32:2,4,20 34:4 35:8,
 25 36:21 40:13 43:13
 44:7,21 46:2,11,19 47:8,
 16,24 48:11,15 49:1,9,15
 50:3 53:13 55:8,12 58:13

59:21 60:12,21 61:1,5
 62:4 64:7 66:1,10,16
 69:8 70:18 71:23 72:7,13
 74:19,22 76:10 77:2
 79:1,2 80:16 82:8,21
 85:9,25 87:17 88:21,24
 89:9,11 91:9 94:23 96:15

year

11:22 38:24 39:5 42:19
 43:20,23 44:12,14,15,17
 53:17 54:3 60:7 62:1
 69:11 72:15,17,20 84:4
 94:6

year-to-date

30:12

years

8:9 9:24 11:12,21 14:25
 19:7 35:8 65:8 75:16
 89:25

yes

5:14 6:3,7,11,14 7:1,4,
 12,16,22 9:6,10,13 10:4,
 12,15,17,20,23 11:7
 12:6,8,10,13,19 13:13,
 19,22 14:3,5,16 15:1,6,
 12 16:7,13 17:6 18:6,11,
 13 19:11 20:4,9,16
 21:11,15,20,23 22:2,22,
 25 23:19,23 24:2,6,9
 26:21 27:21 28:14,21,23
 29:21 30:3,7,9,22 31:16
 32:14 33:21 34:10,22,24
 36:5,8 38:2,8,19,23 40:2
 41:4,8,17,20,22 42:1
 43:5,17 44:21,24 45:10,
 21 46:6,15,23 47:2,5,8,
 17,24 48:20,22 49:4 50:9
 51:10 53:13 55:20,24
 56:11,15 57:4,8,23 58:3
 59:3 61:4,5,10,14,19,22

62:21 63:3 64:12 65:3
 66:9 67:5,11 68:15,19,24
 69:4,8,20,22,25 72:2,19,
 25 73:3,7,16,19,24 74:4
 76:16 77:9,18 78:8,13,21
 79:10,12,15,19,24 80:13
 81:11 82:2,5 84:16,20
 86:14 88:12,19,21 89:17
 90:1,7,14 93:4,8,12,15,
 17,21 94:12 95:2,17,18
 96:13,25 98:15 99:17

you

4:18,24 5:1,2,3,10,11,12,
 19,24 6:1,4,6,8,13,15,19,
 20,24 7:2,6,9,13,14,19,
 21,23 8:2,5,9,14,17,22,
 25 9:2,4,9,11,14,25 10:2,
 11 11:8,19,21 12:11,24
 13:6,12,17,20 14:4
 15:16,22 16:8,14,18
 17:4,7,13,16,24 18:2,19
 19:2,3,17 20:1,3,22 21:1,
 6,12,17,21 22:9,13,14,
 15,18,20 24:13,16,18,19
 25:7,11,12,14,24 26:5,8,
 11,15,19,22,25 27:1,10,
 13,18 28:12,17,22,24
 29:1,5,7,8,9,15,19,24,25
 30:4,10,11,14,16 31:3,8,
 9,10 32:16,19,22,23
 33:1,3,4,12,15,16,24,25
 34:1,2,3,18,19,20 35:16,
 19 36:1,3,19 37:7,8,13,
 19 38:9,24 39:2,6,11,16,
 17,20 40:4,5,7,10,11,12,
 13,15,18,19,22,25 41:3,
 5,25 42:2,6,7,13,19,20,
 22 43:1,2,3,4,6,14,18,22,
 24 44:5,7,8,11,13,16,19,
 22,23 45:5,7,16,17 46:4,
 7 47:9,21,22,25 48:6



49:3 50:5,6,7,8 51:7,25 52:7,12 53:1,2,21,22,23 54:12,23 55:3,9,10,13, 16,17,18,21,25 56:5,8, 16,17,21,22 57:3,5,7,8, 14,21,24 58:1,2,4,5,9,10, 19,20,21,22 59:1,4,11, 16,22 60:4,6,14,18,19,23 61:2,3,15,20 62:6,9,11, 12,13,14,17,20 63:2,6, 10,13 64:2,6,10,14,19, 20,21,23,25 65:4,6,8,11, 13,14,23,24 66:2,3,4,6, 11,13,14,15,17,20,22,25 67:1,12,24 68:3,7,14,18, 22,25 69:13,16,17,19 70:8,13,20,23,24 71:3,4, 6,8,19,25 72:3,11,15,20, 24,25 74:5,6,14,15,16, 20,23 75:2,14,18,23,24 76:2,11,14,15,19,23,25 77:8,15,16,17,19 78:7, 11,20,22 79:11,22 80:15, 18,21 81:2,9,12,18,21, 23,25 83:9 84:3,4,5,8,11, 12,14,19,23 85:1,17,18, 21 86:2,3,8,13,17,23 87:4,7,13,16,25 88:1,22 89:22 90:5,11 91:1,5,15, 17,25 92:1,2,12,14,15, 17,21,22,25 93:1,2,6,10, 16,18 94:16 95:1,3,6,11, 15,20,25 96:1,3,4,10,12, 18,19,23 97:1,2,6,10,12, 18,20,25 98:5,12,14,18, 20,21,22,24 99:4,8,15, 18,24 100:2,4,7	66:7 you're 7:18 11:4 14:13 21:16 38:5 41:1 56:12 57:21 65:7 66:4 73:3 82:20 91:18,20 92:3 93:22 94:16 95:25 96:14 100:3 you've 16:4 30:8 48:17 young 99:16 youngest 11:5 your 5:1,13,23,24 6:4,10,12, 25 7:3,5,14,19,24 8:2,15 11:2 12:20,25 13:7,10 14:23 15:20 16:21 17:3 21:17,18,25 22:8,23 23:8 24:3 26:12,16,20 27:4,7, 18,22,25 29:23,24 30:5, 6,20,21 31:4 32:16,17 33:9,12,23 35:2,3 36:6, 11 37:18,19 38:9,10,16, 25 39:13 40:1 41:6,9 43:22 45:5,6,8,11,17 46:3,7,12,20 47:9,10,19 48:1,5,7,12,17,23 49:19, 20 51:13 52:16 53:2,11, 12,14,25 54:23 56:1 59:12,16,17,22 60:4,6,7, 15 61:25 62:20,22 63:4, 23 64:22 65:19 66:3 67:6,19 70:13 76:4 77:5, 11,12 82:17 84:23,25 85:18,21 87:10 92:2 95:25 98:23 99:25 yourself 65:18 89:14	yourselves 4:18
you'd 54:6 71:22,23 72:8 97:17 you'll 6:2 7:10 48:20 63:18		